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WILDERNESS RECOMMENDATIONS

ARCATA RESOURCE AREA

KING RANGE WSA
and
CHEMISE MOUNTAIN WSA

FINAL ENVIRONMENTAL
IMPACT STATEMENT

1988

U.S. DEPARTMENT
OF THE INTERIOR

BUREAU OF LAND
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DEPARTMENT OF THE INTERIOR

FINAL ENVIRONMENTAL IMPACT STATEMENT

WILDERNESS RECOMMENDATIONS

FOR THE

ARCATA RESOURCE AREA

KING RANGE WSA
(CA-050-112)

AND

CHEMISE MOUNTAIN WSA
(CA-050-111)

Prepared by

BUREAU OF LAND MANAGEMENT

UKIAH DISTRICT OFFICE, CALIFORNIA

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BUREAU OF LAND MANAGEMENT
CALIFORNIA STATE OFFICE
2800 Cottage Way
Sacramento, California 95825

Enclosed is the final Environmental Impact Statement (EIS) prepared for the King Range and Chemise Mountain Wilderness Study Areas in the Arcata Resource Area of the Ukiah District. The EIS analyzes the impact of adding 31,640 acres to the National Wilderness Preservation System. Several No Wilderness and Partial Wilderness alternatives are also considered. The statement was prepared pursuant to Section 102(2)(C) of the National Environmental Policy Act of 1969 and responds to the mandates of Sections 202, 203, and 603 of the Federal Land Policy and Management Act of 1976 to review public land roadless areas of 5,000 acres or more and roadless islands having wilderness characteristics; determine their suitability or nonsuitability for wilderness designation; consider through the planning process additional areas that may be suitable; and report these suitability recommendations to the President no later than October 1, 1991.

For further information, please contact Al Wright, District Manager, Ukiah District, 555 Leslie Street, Ukiah, California, 95482-5599.

Sincerely,

Ed Hastey

Ed Hastey
State Director

Enclosure

FINAL ENVIRONMENTAL IMPACT STATEMENT ON THE
WILDERNESS RECOMMENDATIONS
FOR KING RANGE WSA AND CHEMISE MOUNTAIN WSA

Draft ( ) Final (X) Environmental Impact Statement

1. Type of Action: Administrative ( ) Legislative (X)

2. Abstract:

The Bureau of Land Management, Arcata Resource Area, Ukiah District, California, has analyzed the impacts and resource tradeoffs of proposals to designate major portions of the King Range Wilderness Study Area (WSA) and all of the Chemise Mountain WSA as wilderness. This environmental impact statement also analyzes the impacts and tradeoffs of alternatives to wilderness designation, including partial wilderness, and no wilderness (no action). Wilderness characteristics and special features are examined.

3. For Further Information Contact:

District Manager
USDI-Bureau of Land Management
555 Leslie Street
Ukiah, California 95482-5599

SUMMARY

The purpose of this Environmental Impact Statement (EIS) is to determine the suitability of two Wilderness Study Areas (WSAs) in the Ukiah District for inclusion in the National Wilderness Preservation System. These are the King Range WSA (CA-050-112) and the Chemise Mountain WSA (CA-050-111). This EIS assesses the environmental consequences of managing these WSAs as wilderness or nonwilderness. Both WSAs are about 230 miles north of San Francisco, California. The King Range WSA is in Humboldt County and the Chemise Mountain WSA is in Humboldt and Mendocino Counties.

A draft EIS was released in March, 1985, which proposed wilderness designation for 21,200 acres in the King Range WSA and nonwilderness for the Chemise Mountain WSA. The final proposed action differs from the draft for both WSAs.

The Proposed Action for the King Range WSA is Partial Wilderness. Under this proposal, 20,620 acres would be designated wilderness. Three alternatives were also considered--an All Wilderness Alternative which would designate all 32,900 acres as wilderness plus 735 acres of old-growth between Honeydew Creek and Bearwallow Ridge outside the WSA; another Partial Wilderness Alternative, recommended by the Ukiah District Advisory Council, which would designate 14,000 acres as wilderness; and a No Wilderness/No Action Alternative. Issues analyzed for this WSA are impacts on wilderness values, recreational use levels, livestock management, timber harvesting, reintroduction and management of Roosevelt elk, salmon and steelhead fisheries, and preservation of archaeological resources.

The Proposed Action for the Chemise Mountain WSA is All Wilderness. Under this proposal, all of the 4,340 acres comprising the WSA will be designated wilderness. One other alternative was also considered--a No Wilderness/No Action Alternative. Issues analyzed for this WSA were impacts on wilderness values, and reintroduction and management of Roosevelt elk.

A Summary of the Impacts of the Proposed Action and Alternatives for both WSAs starts on p. 2-22 in Chapter 2.

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Chapter 1

Introduction

CHAPTER 1

INTRODUCTION

This Environmental Impact Statement (EIS) presents the environmental impacts associated with two proposals and considers the possible consequences of alternatives of All Wilderness, Partial Wilderness, and No Wilderness designation for two Wilderness Study Areas (WSAs) in the Arcata Resource Area in the Ukiah District. They are the King Range WSA (CA-050-112) and the Chemise Mountain WSA (CA-050-111). Both WSAs are located within 230 miles of the San Francisco Bay Area (Map 1-1). The King Range WSA is in Humboldt County and covers 32,900 acres of public lands. The Chemise Mountain WSA is in Humboldt and Mendocino Counties and covers 4,340 acres of public lands.

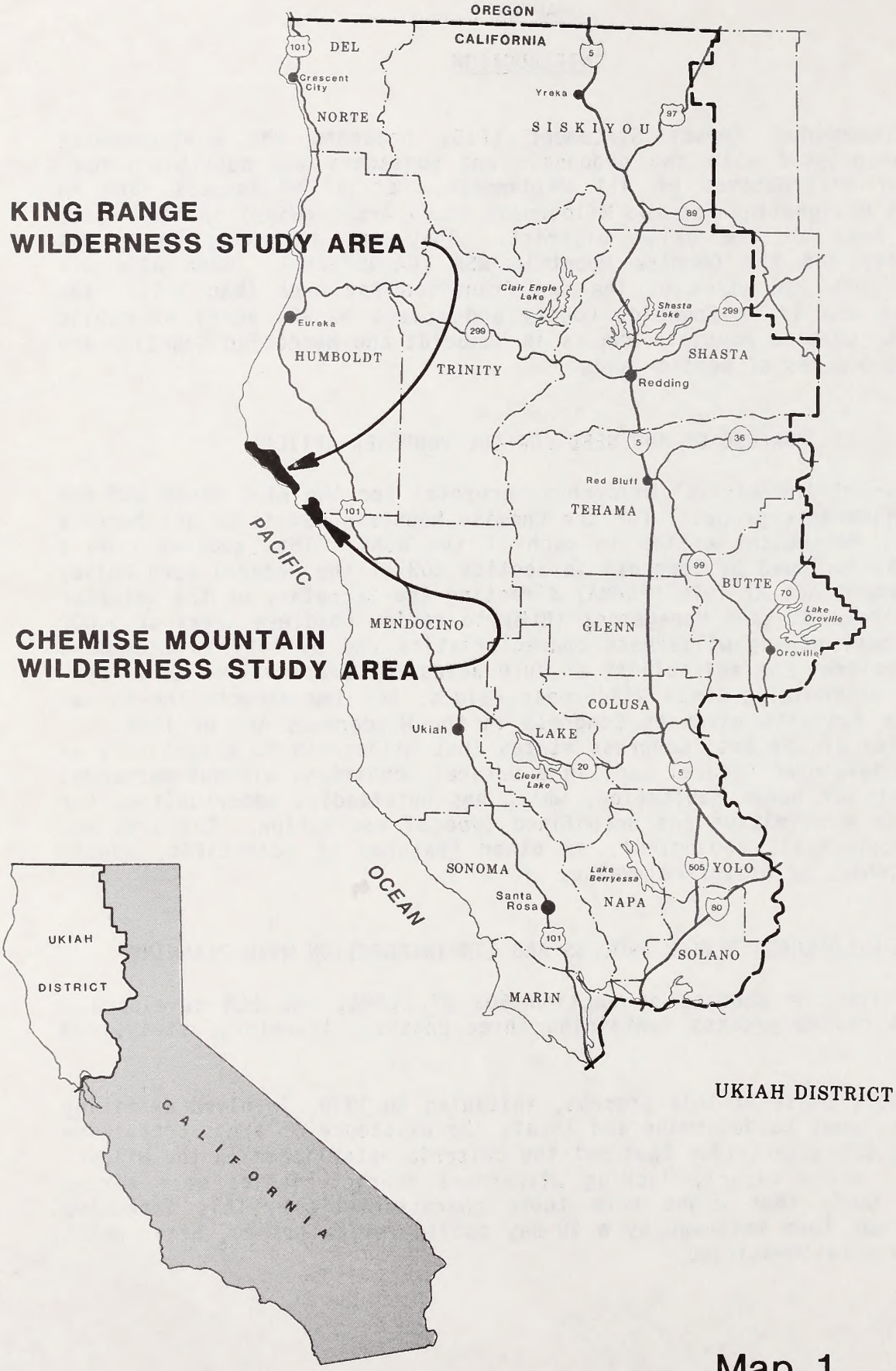
PURPOSE OF AND NEED FOR THE PROPOSED ACTIONS

The purpose of the Partial Wilderness proposal for the King Range WSA and the All Wilderness proposal for the Chemise Mountain WSA is to set forth a pattern of management action in each of the WSAs. This evolves from a requirement included by Congress in Section 603 of the Federal Land Policy and Management Act of 1976 (FLPMA) directing the Secretary of the Interior and the Bureau of Land Management (BLM) to review roadless areas of 5,000 acres or more having wilderness characteristics and by 1991 to recommend to the President the suitability of such areas for preservation as wilderness. In determining these wilderness values, the law directs the Bureau to use the criteria given by Congress in the Wilderness Act of 1964. In Section 2(c) of the Act, Congress states that wilderness is essentially an area of undeveloped Federal land in a natural condition, without permanent improvements or human habitation, which has outstanding opportunities for solitude or a primitive and unconfined type of recreation. The area may contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

THE WILDERNESS REVIEW PROCESS AND ITS INTEGRATION WITH PLANNING

To accomplish the mandate of Section 603 of FLPMA, the BLM developed a wilderness review process containing three phases: inventory, study, and reporting.

The inventory phase of this process, initiated in 1978, involved examining the public lands to determine and locate the existence of areas containing wilderness characteristics that met the criteria established in the Wilderness Act. Areas clearly lacking wilderness characteristics were sorted out from lands that might have those characteristics. This intensive inventory was then followed by a 90-day public review period, after which final WSAs were identified.



UKIAH DISTRICT

Map 1

Location Map

This inventory process and a general description of all of California's WSAs are given in Wilderness: Final Intensive Inventory, Public Lands Administered by BLM California Outside the California Desert Conservation Area (1979). A copy of this publication is available at any BLM office.

The second step in the review process was to integrate wilderness evaluation into the BLM Planning System (43 CFR 1600), which, in this case, is a Management Framework Plan (MFP) amendment for the Arcata Resource Area. The wilderness study criteria and quality standards contained in the BLM's Wilderness Study Policy: Policies, Criteria and Guidelines for Conducting Wilderness Studies on Public Lands (47 FR 5098-5122) were applied to each WSA.

In addition to the above referenced criteria and standards, issues for discussion were identified through public comment and internal scoping, conflicts were analyzed, and alternatives were developed. See page 1-9 for a discussion of which alternatives were selected and why. These alternatives are the basis for analysis of environmental consequences and resource tradeoffs.

Following public review of the draft environmental impact statement, the Ukiah District, with State Director concurrence, prepared a final environmental impact statement and wilderness study report. These were reviewed by the BLM Director and the Secretary of the Interior, who filed this final EIS and who will make a recommendation to the President. The President has up to two years to make his final recommendation to Congress, which has sole authority to designate an area as wilderness. Until Congress decides whether or not to designate an area as wilderness, the WSAs will be managed in accordance with the Bureau's Interim Management Policy and Guidelines for Lands Under Wilderness Review (Department of the Interior, December 1979).

SCOPING

The Council on Environmental Quality Regulations Implementing the National Environmental Policy Act (40 CFR, Part 1501.7) and the BLM planning regulations (43 CFR 1610.4-1) require an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action. Scoping determines in depth the scope and the significant issues to be analyzed in the EIS and identifies and eliminates from detailed study insignificant issues or issues addressed in earlier environmental reviews. Scoping thus reduces the length of the EIS and emphasizes the real alternatives and impacts.

During this process, the scope and importance of issues related to the proposed action and alternatives were identified. Information obtained during the scoping process was one of the sources used to determine which impact topics would be addressed in detail in this EIS. Additional purposes of the scoping process are to inform affected Federal, State, and local agencies and other interested parties about the proposed project, and to identify existing environmental reports and information related to the impact assessment.

The scoping process involved discussions with the public and resource specialists and managers of BLM and other relevant agencies. Written comments were received and compiled as a result of Federal Register announcements, news releases, mailings, and articles about the proposal. Comments were also solicited during public meetings. In addition, the initial scoping effort has been followed by an effort to continue agency and public involvement throughout the development of this EIS. This section outlines the steps taken by BLM for the scoping and public involvement process for the EIS.

SCOPING PROCESS

- Initial wilderness inventory and public comment period - 1978-1979.

- Intensive wilderness inventory and public comment period - 1979-1980.

- A Notice of Intent to prepare an amendment to the King Range Management Framework Plan and the environmental impact statement for the two Wilderness Study Areas was published in the Federal Register on December 30, 1983.

- A scoping letter was mailed in March 1984 to over 1,000 organizations, agencies, and individuals on the Ukiah District's mailing list. This letter explained the planning process and asked for identification of issues for the Wilderness Study Areas. As of November 1, 1984, only 21 responses to the letter had been received.

- In June 1984 a Technical Review Team (TRT) was formed by the Ukiah District Advisory Council (DAC) to study wilderness issues in detail and to make a recommendation to the council. The TRT consisted of seven interest categories: wilderness and dispersed recreation, recreation, forestry, wildlife, soils and watershed, grazing and landowners, and local planning. Members with expertise in each category were chosen by the DAC and given a two-day field orientation in late June. The TRT held two meetings to discuss issues and alternatives.

- The Ukiah District Advisory Council, after reviewing the TRT's report, was given a field orientation of the King Range in August 1984. The DAC met to discuss the issues and made a recommendation to the District Manager on October 15, 1984. This recommendation is presented as a Partial Wilderness Alternative in Chapter 2 and is analyzed in Chapter 4.

- The draft environmental impact statement was released to the public on April 5, 1985; the comment period formally ended July 3, 1985. Two public hearings were held on the adequacy of the draft statement and the preliminary wilderness recommendations, a hearing in Eureka on May 8, and one in Redway on May 9. As of August 1, 1985, 515 individual comments were received.

ISSUES SELECTED FOR ANALYSIS

King Range WSA

1. Impacts on the Wilderness Values. The wilderness values of naturalness, opportunities for solitude, opportunities for primitive recreation, and various special features of the WSA could benefit from wilderness designation. The same values may be adversely affected by uses and actions that would occur should the WSA not be designated wilderness such as the use and maintenance of existing roads found throughout the study area. The significance of these impacts is an issue for analysis in the EIS.

2. Impact on Motorized Recreation Use Levels. Wilderness designation would preclude the use of motorized vehicles in the WSA eliminating 1,780 visitor days of motorized recreational use which currently occur annually. Eliminating this use could affect the availability of opportunities for motorized recreational use and shift the uses currently occurring in the WSAs to adjacent lands. The impacts of wilderness designation on motorized recreational use in the WSA is an issue for analysis in the EIS.

3. Impact on Livestock Grazing Management. Five grazing leases occur within the northern portion of the WSA. Wilderness designation could affect livestock operations by precluding the types of actions needed to administer these leases and some planned range improvement projects. The impact of wilderness designation on the management of livestock grazing is an issue for analysis in the EIS.

4. Impacts on Timber Management. Nearly 6,500 acres of available commercial forest land (CFL) with over 60 million board feet (MMbf) of standing merchantable timber available for harvest are within the King Range WSA. Wilderness designation would eliminate these lands from timber harvest and preclude timber stand improvements. The impact of wilderness designation on timber harvesting and management within the WSA is an issue for analysis in the EIS.

5. Impact on the Reintroduction and Management of Roosevelt Elk Populations. There is concern that habitat manipulation (brush removal and prescribed burning) for the benefit of big game, particularly the reintroduced Roosevelt elk, may be limited by wilderness designation. Over the past several years, efforts have been made to reintroduce the Roosevelt elk into the WSA. To date approximately 25 elk have been transplanted. An additional 35 will be transplanted over the next 10 years. These elk are expected to continue to use both the Chemise Mountain and King Range WSA. Wilderness designation could restrict certain reintroduction activities such as the use of motorized vehicles to transport and monitor these herds. The impact of wilderness designation on the reintroduction of the Roosevelt elk is an issue for analysis in the EIS.

6. Impact on Salmon and Steelhead Spawning and Nursery Streams. Several public comments on the DEIS concerned the Honeydew Creek watershed and the protection and enhancement of the Mattole River fisheries resource. The ability of this river and other streams throughout the area to produce salmon and steelhead could be adversely affected by uses that could occur should the area not be designated wilderness. The significance of these impacts is an issue for analysis in the EIS.

7. Impact on the Preservation of Archaeological Resources. Important archaeological resources exist along the King Range beach and coastal marine terraces. The beaches and terraces associated with these resources will be closed to vehicle use under all alternatives. However, these resources could be impacted by uses and actions that would occur should the WSA not be designated wilderness and the roads providing access to the beach and marine terraces not be closed to vehicular use. The beach is currently closed to vehicular use and would continue to be closed under the Proposed Action. The significance of these impacts on the area's archaeological resources is an issue for analysis in the EIS.

Chemise Mountain WSA

1. Impact on Wilderness Values. The wilderness values of naturalness opportunities for solitude, opportunities for primitive recreation, and various special features of the WSA could benefit from increased protection that would be provided by wilderness designation. The same values may be adversely affected by uses and actions that could occur should the WSA not be designated the wilderness the current primitive area designation changed. The significance of these impacts is an issue for analysis in the EIS.

2. Impact on the Reintroduction and Management of Roosevelt Elk. Over the past several years, efforts have been made to reintroduce the Roosevelt elk into the WSA. To date approximately 25 elk have been transplanted. An additional 35 will be transplanted over the next 10 years. These elk are expected to continue to use both the Chemise Mountain and King Range WSAs. Wilderness designation could restrict certain reintroduction activities such as the use of motorized vehicles to transport and monitor these herds. The impact of wilderness designation on the reintroduction of the Roosevelt elk is an issue for analysis in the EIS.

ISSUES CONSIDERED BUT DROPPED FROM FURTHER ANALYSIS

King Range WSA

1. Impact on Water Quality. The majority of the erosion, soils, and watershed problems in the WSA are natural phenomena. In most instances, they are unrelated to potential management actions under the alternatives analyzed in Chapter 4. These management actions include prescribed burns, timber sales, and timber stand improvements, increased vehicle use and maintenance, and range and recreation improvements--none of which will significantly impact water quality either because of their location, the scale of the Proposed Actions,

and/or the mitigation measures to be used in implementing the actions (e.g., SYU 13 mitigation measures, Appendix A). Problems related to road stability and siltation of fisheries habitat will be analyzed under the wilderness values and salmon and steelhead spawning and nursery streams issues. Therefore, the issue of impacts on water quality in general was not analyzed.

2. Impact on Wind Energy Development. King Range has been identified by the California Energy Commission as having potential for wind energy development which may be affected by wilderness designation. However, there are no leases at the present time. The area is unlikely to be considered prime resource for development in the near future due to limited geographic extent of the resource and geographic isolation (California Energy Commission, personal communication, 1984). Therefore, this issue was not analyzed.

3. Impact on Energy and Nonenergy Mineral Development. The Mineral Report prepared by the U.S. Geological Survey for this WSA indicates a very low potential for oil and gas or geothermal occurrence or development. Although there has been some historical exploration for base and precious metals, the report indicates almost no economic potential for gold and low economic potentials for lead, zinc, copper, and silver. Therefore the impact of the alternatives on this issue was not analyzed.

4. Impact on Botanical Resources. Within the King Range WSA, there exist four significant botanical resources--the Mattole dune system, the leafy reedgrass (a candidate for listing as threatened of extinction by the U.S. Fish and Wildlife Service), remnant populations of coastal prairies, and a 600-acre stand of old-growth Douglas-fir. An issue dealing with these resources was considered but dropped because no specific impacts on these resources were identified. Based on the location of these resources in relation to current and planned resource projects such as road and trail maintenance and proposed logging operations, and projected recreational use levels, little or no change to these resources is anticipated with our without wilderness designation.

5. Impact on Endangered Species and Wildlife Other than the Roosevelt Elk. An issue dealing with endangered species and wildlife in general was considered but not included in this EIS because no specific impacts on populations or the habitat of any specific species were identified. Use of the King Range area by species such as bald eagles and peregrine falcons is casual; there are no known nesting sites. Old-growth dependent species, such as spotted owls, are found in the Honeydew Creek drainage which is currently withdrawn from road building and timber harvest, and excluded from motorized vehicle use. Based on current and planned resource projects in the WSA, little or no change in wildlife populations or habitat is anticipated with wilderness designation or nondesignation.

6. Impact on Predator Control. An issue dealing with predator control within the King Range WSA was considered but dropped from further analysis. The existing predator control plans (see p. 2-8, Grazing

Management Actions) for the WSA are consistent with the predator control requirements under the Bureau's Wilderness Management Policy, including targeting offending predators and prohibiting the use of chemicals. Based on the consistency of the planned actions and the small scale of the predator control program (five coyotes, districtwide in 1985), this concern was dropped from further consideration.

Chemise Mountain WSA

1. Impacts on Water Quality. The majority of the erosion, soils and watershed problems in the WSA are natural phenomena and is unrelated to the management actions such as brush clearing, prescribed burning, and trail construction under the alternatives analyzed in this document because of their location, the scale of the Proposed Action, and/or the mitigation measures to be used in implementing the action. Therefore, the issue of impacts on water quality was not analyzed.

2. Impact on Energy and Nonenergy Mineral Development. The Mineral Report prepared by the U.S. Geological Survey for this WSA indicates a very low potential for oil and gas or geothermal occurrence or development. Although there has been some historical exploration for base and precious metals, the report indicates almost no economic potential for gold and low economic potentials for lead, zinc, copper, and silver. Therefore the impact of the alternatives on this issue was not analyzed.

3. Impact on Timber Management. Since the amount of timber on the WSA (standing volume of 500 MBF) is nominal and logging is not allowed under the current management of the WSA as a Primitive Area, the timber resource and its management would not be affected by the alternatives and was, therefore, dropped from further analysis.

4. Impact on Vegetation Other Than Timber. An issue dealing with vegetation in general was considered but dropped because no specific impacts on vegetation communities or individual species were identified. Based on current and planned resource projects such as prescribed burning and trail construction in the WSA, little or no change in vegetation is anticipated with or without wilderness designation.

5. Impact on Endangered Species and Wildlife Other than the Roosevelt Elk. An issue dealing with endangered species and wildlife in general was considered but not included in this EIS because no impacts on populations or the habitat of any specific species was identified. Use of the Chemise Mountain WSA by species such as bald eagles and peregrine falcons is casual; there are no known nesting sites. Based on the area's Primitive Area designation and current and planned resource projects, little or no change in wildlife populations or habitat is anticipated with out without wilderness designation.

SELECTION OF THE PROPOSED ACTIONS AND DEVELOPMENT OF ALTERNATIVES

Development of the proposed actions is guided by requirements of the Bureau's Planning Regulations, 43 CFR Part 1600 and the Council on Environmental Quality's Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act. The BLM's Wilderness Study Policy (published February 3, 1982, in the Federal Register) supplements the planning regulations by providing specific factors to be considered during the planning sequence in developing suitability recommendations.

Outlined below are the Proposed Actions and alternatives developed for the King Range and Chemise Mountain WSAs selected for analysis.

King Range WSA

The Proposed Action for the King Range WSA is Partial Wilderness. Under this proposal, 20,620 acres will be designated wilderness; 12,280 acres within the WSA will not be designated, but will be managed for other multiple use as designated in this document and in the King Range Management Program (1974).

The rationale for this proposal is (1) the lands proposed for wilderness designation contain outstanding wilderness values; (2) the lands proposed for designation would add diversity to the NWPS and balance the geographic distribution of federally administered wilderness areas; and (3) the quality of the mandatory wilderness characteristics on those lands proposed for designation are high due to the area's topography, isolation, and location. In addition, the proposal is consistent with the King Range Act of 1970 and the KRNCA 1974 Management Plan. It will preserve and protect the area's most significant resource values, including 16.5 miles of unroaded shoreline, while providing for other multiple uses, such as grazing, hunting, and fire protection which would not detract from the area's unique character.

The Proposed Action differs from the Proposed Action which was analyzed in the DEIS in that the area between Willow Creek and Sea Lion Gulch has been dropped from further consideration decreasing the suitable portion of the Partial Wilderness Proposal from 21,200 acres to 20,620 acres. In addition, the Smith-Etter Road has also been excluded from the wilderness recommendation (to within one-third mile of the beach), all roads within the suitably recommended portion of the WSA have been closed to public vehicle use, and the Honeydew Wildlife Preserve has been proposed for designation as an Area of Critical Environmental Concern (ACEC).

Three alternatives were also considered--an All Wilderness Alternative, a No Wilderness/No Action Alternative, and another Partial Wilderness Alternative.

Under the All Wilderness Alternative, 33,635 acres (32,900 from the WSA plus 735 from the old-growth addition) would be designated wilderness. This alternative represents the maximum possible acreage that could be recommended for wilderness designation.

Under the No Wilderness/No Action Alternative, none of the 32,900 acres in the WSA nor the 735-acre old-growth addition would be designated as wilderness; the entire acreage would be managed for multiple-use as described in this document and in the King Range Proposed Management Program (1974).

Under the Partial Wilderness Alternative, 14,000 acres of the WSA would be designated as wilderness; 28,900 acres of the WSA would not be designated but managed for multiple-use under the King Range Proposed Management Program (1974).

Chemise Mountain WSA

The Proposed Action for the Chemise Mountain WSA is All Wilderness. Under this proposal, all 4,340 acres would be designated wilderness.

The rationale for this proposal is (1) the area contains outstanding wilderness values; (2) inclusion of Chemise Mountain in the NWPS will provide an opportunity for a broad spectrum of people to have wilderness experiences, because of its convenient location; (3) there are no significant resources or areas that would be affected by wilderness designation; and (4) no overriding national interest issues exist.

One alternative was also considered--a No Wilderness/No Action Alternative which would not designate any of the 4,340 acres wilderness. Under this alternative, these lands would be managed in accordance with the King Range Management Program (1974) as a Primitive Area.

ALTERNATIVES CONSIDERED BUT DROPPED FROM FURTHER ANALYSIS

King Range WSA

The King Range WSA easily lends itself to any number of partial wilderness alternatives. However, the philosophy of alternative formulation is to restrict this study to detailed analysis of alternatives which address an issue, a significant resource conflict, manageability problems, or the quality of mandatory wilderness characteristics.

Another postulate of this study is to restrict analysis to the issue of wilderness suitability and any relevant, proximate issues, rather than to reanalyze all of the issues which were addressed in the 1974 final environmental impact statement for the King Range National Conservation Area. For this reason, alternatives which include analysis of opening or closing the entire beach to vehicles was not included. "No Wilderness" alternatives which change the management direction within designated portions of the WSA were also not included.

Several alternatives were recommended by the public during review of the DEIS. One alternative was to include the entire King Range National Conservation Area in the National Wilderness Preservation System; a sub-alternative is to also include offshore areas and airspace above the Conservation Area. However, these recommendations are outside the Bureau's statutory authority or the Congressional intent of establishing the wilderness system.

Also considered for analysis were two alternatives analyzed in the draft EIS but no longer considered appropriate. The All Wilderness Alternative of the DEIS did not include split estate (public surface and private mineral estate). To analyze in this document a separate alternative that pulls split estate out of the All Wilderness Alternative would add unnecessarily to the matrix of alternatives and management actions. Furthermore, the two alternatives would have the same impacts.

The Partial Wilderness Alternative that was analyzed in the DEIS (Alternative 5 of the DEIS) is not analyzed here because it is within the range of alternatives analyzed.

Chemise Mountain WSA

A Partial Wilderness Alternative was considered but dropped from further analysis because the small size, compact shape, and lack of resource conflicts made such an alternative for the Chemise Mountain WSA impractical and unnecessary.

Chapter 2

Proposed Actions and Alternatives

CHAPTER 2

PROPOSED ACTIONS AND ALTERNATIVES

Since the pattern of future actions within the WSAs cannot be predicted with certainty, we have made projections of management actions to allow the analysis of impacts under the Proposed Action and alternatives. These projections are the basis of the impacts identified in this EIS. They represent reasonably feasible patterns of activities which could occur under the Proposed Actions and alternatives analyzed.

KING RANGE WSA
(CA-050-112)

PROPOSED ACTION (PARTIAL WILDERNESS)

Approximately 20,620 acres of public land in the King Range WSA are recommended as suitable for wilderness designation; 12,280 acres within the WSA are not recommended for wilderness designation but will be managed in accordance with the existing King Range Management Program, 1974 (see Map 2-1).

Under this proposal, all roads within the portion of the WSA recommended as suitable will be closed to public vehicle use. Approximately 2,980 acres within the Honeydew Drainage will be designated an Area of Critical Environmental Concern (ACEC). In addition, ten timber sales including 2,125 acres outside the suitable portion of the WSA and 35 MMbf of timber will be harvested over the next 100 years. Existing levels of livestock grazing in the five grazing allotments will continue.

Vegetation Management Actions

1. Prescribed burning of brush will be implemented to maintain a fire dependent ecosystem. For the foreseeable future (next 10-15 years), this will amount to about 80 acres per year on the ridgetops and midslopes on the west side of the WSA (all in the area recommended suitable under this alternative).

2. Field inventories will be conducted to identify the location of sensitive plant species on these habitats prior to these burns.

3. In addition these burns will be limited to 10- to 15-acre patches in order to minimize any erosion.

4. Manual (broadcast) seeding of native perennial grasses on 15 acres per year for 10 years will stabilize erosive soils from Randall Creek north. It is estimated that half of the sites would be in the area recommended suitable for wilderness designation and half in the area recommended nonsuitable.

Timber Management Actions

5. Ten timber sales will be conducted in the next 100 years involving approximately 19.7 MMbf (million board feet) standing volume that exists on 2,430 acres outside the area proposed for wilderness designation but within the WSA. This will require construction of 3 to 4 miles of main line and spur roads. These roads will be constructed in locations that require minimal surface disturbance and will avoid unstable areas and slopes in excess of 70 percent.

6. All stream-crossing structures will be designed and constructed to allow free passage of fish in streams where significant fisheries resources exist.

7. Buffer strips will be a minimum width of 125 feet (horizontal distance) from the edge of the stream for perennial streams and 75 feet for intermittent streams.

8. Timber stand improvement will be conducted on 100 acres per year outside the suitable area all north of Smith-Etter Road and near Telegraph Peak. This will consist of precommercial thinning (300 cords of hardwood to be sold), brush conversion, and planting.

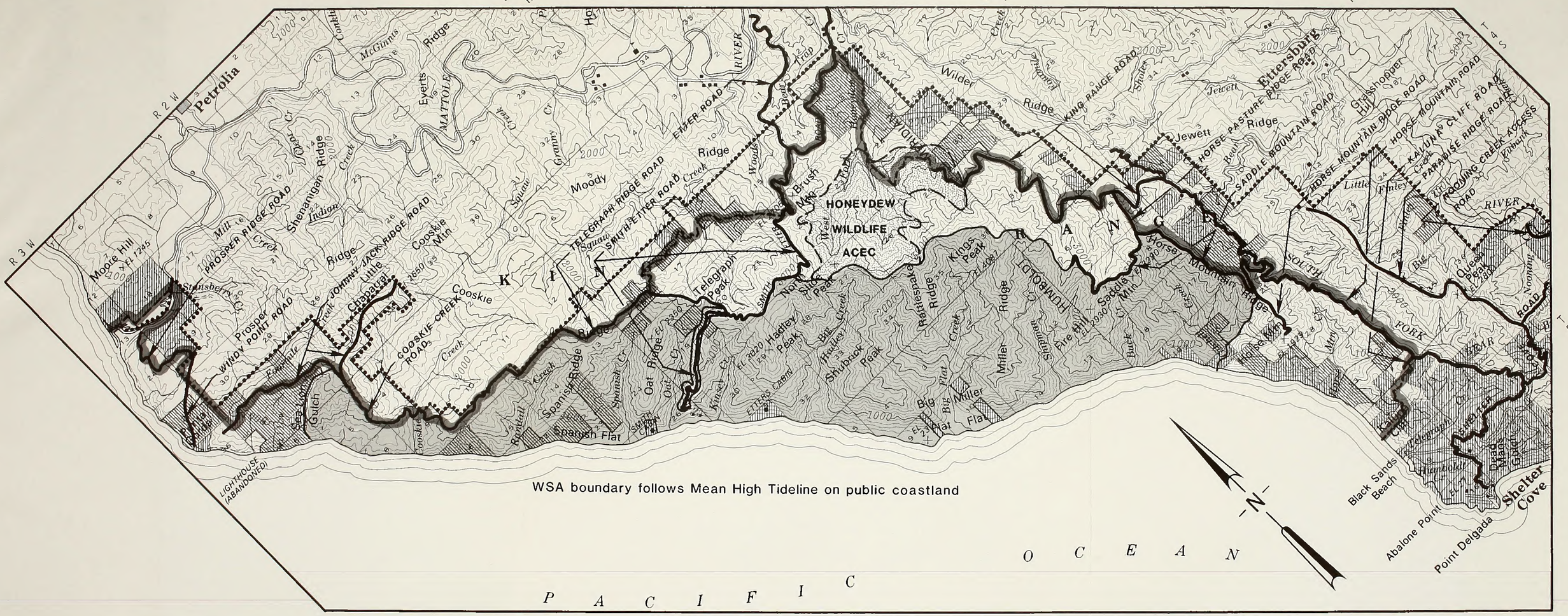
9. Lands within the Honeydew Wildlife ACEC will continue to be withdrawn from the timber production base under the Timber Production Capability Classification (TPCC).

Wildlife Management Actions

10. A temporary elk enclosure (30 acres) just north of Spanish Ridge within the area recommended suitable to facilitate the reintroduction of Roosevelt elk will be constructed. This fence will be made with 12-foot 4X4's (10 feet above ground spaced 12 feet apart) and 4-inch hardware cloth. An additional 35 elk will be transplanted over the next 10 years. The elk will be trapped to the exclosure in accordance with wilderness management policy.

11. Spring developments (water boxes) will be constructed at Horse Mountain, Big Flat, Kinsey Ridge, and Telegraph Ridge Road. Big Flat and Kinsey Ridge are within the area recommended suitable for wilderness. The other two sites may or may not be in the area recommended suitable depending upon their exact location which has not been determined. Each box will be approximately 4 feet by 8 feet by 3 feet and will be designed to blend in with the surrounding terrain.

12. Three stream barriers will be dismantled every other year sufficiently to allow fish passage to maintain the quality of the anadromous and native fish habitat throughout the area. It is estimated that two-thirds of the sites would be in the area recommended suitable for wilderness and one-third in the area recommended nonsuitable.


T 2 S R 1 W
T 3 S R 1 E
R 2 E
T 4 S
T 5 S
R 2 W
R 3 W
Petrolia
Moore Hill
Stansbery
Prosper Ridge Road
Prosper Point Road
Shenanigan Ridge
Mattole
Everts Ridge
McGinnis
Cooskie Mtn
Cooskie Creek Road
Chapparal
Little Jonny Jack Ridge Road
Telegraph Ridge Road
Smith-Petter Road
River Road
Moody Ridge
Telegraph Peak
Honeydew Wildlife ACEC
Wilder Ridge
King Range Road
Jewett Ridge
Horse Pasture Ridge Road
Saddle Mountain Road
Horse Mountain Ridge Road
Horse Mountain Road
Kaiuna Cliff Road
Paradise Ridge Road
Rooting Creek Access Road
Ettersburg
Grasshopper Hill
Humboldt Ridge
Rattlesnake Ridge
Kings Peak
Fire Hill
Saddle Mtn
Horse Mountain Ridge
Queen Peak
Spanish Ridge
Spanish Flat
Oat Ridge
Hadley Peak
Shubrick Peak
Miller Flat
Big Flat
Lighthouse (Abandoned)
Black Sands Beach
Abalone Point
Point Delgada
Shelter Cove
Dead Mans Gulch
Telegraph Creek
Kinsey Creek
Big Creek
Miller Creek
Buck Creek
Horse Mtn
Mattole River
Lost Coast
South Fork
Little Finley Creek
Big Finley Creek
Nooning Creek
Kiwah Creek
Kinsey Cr
Etters Cabin
Smith Cabin
Spanish Cr
Oat Cr
Squaw Cr
Indian Creek
Mill Creek
Cooskie Creek
Rankell Creek
Sea Lion Gulch
Chapparal Creek
Jonny Jack Creek
Grandy Creek
Squaw Creek
Brush Creek
Woody Creek
Trap Cr
Hunter Creek
Lowrey Creek
Shuter Creek
Jewett Creek
Beach Creek
Kiwah Creek
Telegraph Creek
Kaiuna Creek
Finley Creek
Big Creek
Nooning Creek
Kinsey Creek
Miller Creek
Buck Creek
Horse Mtn Creek
Rattlesnake Creek
Shubrick Creek
Hadley Creek
Spanish Creek
Oat

13. In the area recommended nonsuitable, plant riparian vegetation (native species such as alder, willow, and Douglas fir) along the Mattole River estuary and the tributary that forms the southern slough.

14. In the area recommended nonsuitable place logs and rootwads in the Mattole River near its mouth to provide summer rearing habitat for salmonoids.

15. In the area recommended nonsuitable portions of the Mattole River estuary will be excavated using a track-mounted backhoe to improve salmonoid habitat by improving water flow.

16. Designate the 2,980-acre Honeydew Wildlife Preserve an Area of Critical Environmental Concern.

Fire Management Actions

17. A Fire Management Plan has been written for the entire King Range. It will become an addendum to the Wilderness Management Plan and, thus, will apply to both the suitable and nonsuitable portions of the WSA. Under this plan, fixed-wing aircraft, helicopters, and ground crews will be used for fire control. Cross-country vehicle travel will be permitted only where the terrain and soil conditions would permit such travel without damage to vegetative cover and engines will be prohibited from cross-country travel on slopes greater than 25 percent. Heavy equipment, such as, tracked vehicles and dozers will be permitted only to provide clear passage on existing roads (King Range, Smith-Etter, Telegraph Ridge, and Saddle Mountain). Existing firebreaks throughout the WSA will no longer be maintained but allowed to return to their natural state.

18. Up to seven 100 foot-by-100 foot helispots will be constructed along the ridge lines in the central portions of the WSA as a presuppression measure. Four or five of the helispots will be constructed in the portion of the WSA recommended suitable. They will be constructed on the west side of ridges and disturb approximately 2 acres of land in all. They will be located in areas where they will create the least amount of disturbance possible.

Vehicle Access Management Actions

19. All 3 miles of Spanish Ridge Road which is within the area recommended suitable, will continue to be closed to all vehicle use except emergency use and use by livestock operators for range improvement or maintenance requiring heavy equipment or supplies that cannot reasonably be brought in by horse. It will be maintained as a public hiking/horse trail.

20. The Smith-Etter Road, located outside the area recommended suitable, will be closed to motorized vehicle use from November 1 through March 31 because of unstable conditions related to weather. During the remainder of the year it will be open to the public and BLM administrative use except for that part of the road west of a 1,600-square-foot parking area to be bladed one-third mile from the beach

on an existing cutbank. As a result, motorized vehicle use will increase from 750 visitor days annually to 1,000 visitor days. There will continue to be access for the last one-third mile for the three owners of private inholdings, and emergency use. Livestock operators will have vehicle access over the last one-third mile only for range improvement or maintenance requiring heavy equipment or supplies that cannot reasonably be brought in by horse. The entire road will be maintained annually by BLM using a grader and installing water bars and culverts as necessary.

(See Management Action 30, below.)

21. West of its intersection with Horse Pasture Ridge Road, all 4 miles of Saddle Mountain Road will be closed to public vehicular use. This 4-mile stretch will be added to the King Crest Trail with appropriate signing but is not expected to increase visitor use above the 900 visitor days the trail currently receives annually.

22. Telegraph Ridge Road (2 miles of which are in the area recommended nonsuitable) will continue to be closed to motorized vehicular use from November 1 through March 31, because of unstable soil conditions related to weather. During the remainder of the year the road will be open to motorized vehicular use. Projections indicate that recreational vehicular use will increase slightly, along Telegraph Ridge Road, but will remain at levels below 125 visitor days annually over the foreseeable future.

23. Telegraph Ridge Road will be maintained annually by BLM using a grader and installing water bars and culverts as necessary.

24. All 3 miles of Windy Point Road (which is outside the area recommended suitable) will be closed to motorized vehicular use from November 1 through March 31 because of unstable soil conditions related to weather. During the remainder of the year the road will be open to motorized vehicular use. Projections indicate that recreational vehicular use will not increase, but remain at the current 50 visitor days which occur annually. (The private inholder will continue to be able to use this road for access.)

    Maintenance of Windy Point Road will be limited to that sufficient for 4-wheel drive use, i.e., blading but no contouring.

25. The final western 3 miles of the King Range Road will remain open to motorized vehicular use. Projections indicate that recreational vehicular use will increase slightly along King Range Road but will remain at levels below 650 visitor days per year over the foreseeable future. The road will be maintained by BLM in a manner similar to that for the Smith-Etter Road (Management Action 20, above).

    Overall, 3 miles of road in the WSA would be opened to motorized use yearlong, 10 miles open/closed to seasonal use, and 7 miles will be closed to motorized vehicle use yearlong. The remainder of the WSA will be closed to motorized vehicle use, except for the beach (outside of the area recommended suitable) from just south of Kaluna Cliff to

Gitchell Creek (see Management Action 38). In all, motorized recreational use will increase from 1,800 visitor days annually to an estimated 2,150 visitor days, including 300 visitor days per year on the open area north of just south of Kaluna Cliff.

26. Lands within the Honeydew Wildlife ACEC will remain closed to motorized vehicular use.

Recreational Management Actions

27. To improve visual quality, the cutbanks along the Buck Creek Trail will be revegetated with native species by broadcast seeding of grasses and hand planting individual shrubs. Within the area recommended suitable, approximately 10 acres will be treated by 1990.

28. Hiking trails and signs will be maintained on a yearly basis using hand tools. This will involve a total of 15 miles of trails, all within the area recommended suitable for wilderness designation.

29. A hiking trail approximately 3 miles long will be constructed from the end of the King Range Road to Bear Trap Ranch.

30. A short-term parking area and "staging area" will be constructed outside the suitable portion of the WSA along the Smith-Etter Road. The parking area is intended for day use only and will accommodate 7 to 8 vehicles. The facility will be designed to accommodate 4-wheel drive-type and not large, self-contained recreation vehicles or trailers. Development of the site will not require substantial site disturbance and will take advantage of the natural screening from the existing beach front. A gate and substantial barriers will also be constructed to restrict vehicular access to the beach. Barriers will be integrated into natural features to contain all types of vehicles and will be integrated to blend in with the area's existing features. The site itself is currently screened from the beach. Additional measures will be taken to rehabilitate any further disturbance using natural vegetation and materials as appropriate.

A 1.5-acre "staging area" approximately 1.8 miles up from the beach is also proposed to enhance access and recreational opportunities. The site is designed for long-term visitor parking and will serve as a staging area for hiking and camping trips into the King Range Wilderness from the Smith-Etter Road. It will accommodate 15 vehicles and will consist of primitive walk-in tent sites and a toilet facility. Substantial barriers will also be constructed to restrict vehicle access to within the staging area and along the road. Barriers will be integrated into natural features to contain all types of vehicles and will be designed to blend in with the area's existing features.

Regulatory and interpretive signing regarding the use and restriction of both sites will be posted at the junction of the Smith-Etter and Telegraph Ridge Roads and at each site. Ranger patrols will be increased and the area more frequently monitored to assess the impact

of visitor use. Should the road become unmanageable (i.e., vehicles or motorcycles cross barriers and go onto the beach), the Smith-Etter Road will be gated and closed further up the mountain. Overall development of these sites and the duration of use will be determined through detailed plans and further environmental analysis which will assess visitor use trends and resource capability.

Grazing Management Actions

31. The existing five allotments, totaling 11,600 acres within the WSA (7,800 of which are in the area recommended suitable for wilderness) with 3,000 AUMs (1,100 in the suitable area) would be managed at present levels. This includes implementation of current plans for the following range improvements: construction or improvement of 11.75 miles of fences (2 miles in the suitable area); installation and maintenance of sixteen 20 foot-by-20 foot exclosures (4 in the suitable area); installation and maintenance of 9 water troughs (3 in the suitable area); and installation and monitoring of 23 utilization cages (5 in the suitable area).

32. To keep livestock out of riparian vegetation in the Mattole River estuary, 1.2 miles of fence will be constructed using 4 x 4 posts and barbed wire not to exceed 42 inches high with an 18-inch-high smooth bottom wire on the north side of Lighthouse Road from the parking area east.

33. Predator control will be done by shooting or trapping of offending individuals only when livestock losses from predators are determined by the Bureau to be significant. No predator control will be done within one mile of the beach or near recreation developments (trails and campgrounds). M-44s (cyanide cartridges) will not be used.

(See Management Actions 19-25 for restrictions on vehicular access.)

Land Acquisition Management Actions

34. All privately owned land within the boundaries of the King Range NCA outside of Shelter Cove and Whale Gulch will be acquired. This involves approximately 200 acres within the proposed wilderness and 1,200 acres within the portion of the WSA not recommended as suitable.

Cultural Resource Management Actions

35. The lighthouse at Punta Gorda will be painted annually to prevent deterioration. The lighthouse is outside the area recommended suitable.

36. Archaeological sites in the suitable portion of the WSA determined to be being eroded by ocean waves or streams will be excavated. This will amount to the excavation of four sites totaling up to 2 acres over 5 years, depending on the rate of erosion.

37. Site monitoring will also take place. To this end, 45 photo-monitoring stations will be established and examined semiannually. In addition, known sites will be patrolled at a minimum of once a month.

38. Motorized vehicular use will continue to be restricted to designated routes of travel, except that from just south of Kaluna Cliff to Gitchell Creek the beach will remain open to vehicle use. This use is expected to remain at about 280 visitor days per year. No cultural sites occur in this area.

ALL WILDERNESS ALTERNATIVE

Under this alternative 33,635 acres (32,900 from the WSA plus 735 from the old-growth addition) of public lands would be designated wilderness. This alternative includes split estate lands because the low mineral values indicated in the USGS-BM Report make the exclusion of split estate lands from wilderness consideration unwarranted. The acreage figure does not include private land (Map 2-2), but as private lands are acquired they would be automatically added to the wilderness.

The Smith-Etter Road would be maintained to provide access for private landowners. This road along with all other roads that penetrate the wilderness boundary (approximately 20 miles of roads) would be closed to public vehicle use eliminating approximately 1,500 visitor days of motorized vehicle use annually. Livestock grazing would continue as established prior to wilderness designation, and predator control would be allowed within the wilderness under the constraints of the Wilderness Management Policy.

Vegetation Management Actions

1. Same as Management Actions 1-4 under the Proposed Action, page 2-1.

Timber Management Actions

2. No timber sales would be conducted; 54.7 MMbf of timber on 4,555 acres would be removed from sale/harvest.

3. No timber stand improvement projects would be conducted.

Wildlife Management Actions

4. Same as Management Actions 10-14 under the Proposed Action, pages 2-2 and 2-5. Management Action 15 under the Proposed Action is omitted under this alternative because of the heavy equipment it would require.

Fire Management Actions

5. Same as Management Actions 17 and 18 under the Proposed Action, page 2-5.

Vehicle Access Management Actions

6. Same as Management Action 19 under the Proposed Action, page 2-5.

7. All 5 miles of the Smith-Etter Road would be closed to public motorized recreation eliminating the current 750 visitor days of motorized vehicle use annually. There would continue to be access for the owners of private inholdings and emergency use. Livestock operators could have vehicle access only for range improvement or maintenance requiring heavy equipment or supplies that cannot be reasonably brought in by horse. The road would be maintained by private inholders and grazing lessees once a year.

8. Same as Management Action 21 for the Proposed Action, page 2-6.

9. All 5 miles of Telegraph Ridge Road would be closed to public motorized recreation eliminating the current 100 visitor days of motorized vehicle use and would have the same restrictions as the Smith-Etter Road (see Management Action 7 above).

10. All 6 miles of the Windy Point and the King Range Road west of Bearwallow Ridge would be closed to motorized vehicle use eliminating 700 visitor days of motorized vehicle use annually.

Recreational Management Actions

11. Same as Management Actions 27, 28, and 29 for the Proposed Action, page 2-7. Neither the parking area nor "staging area" (Management Action 30, Proposed Action) would be developed along the Smith-Etter Road.

Grazing Management Actions

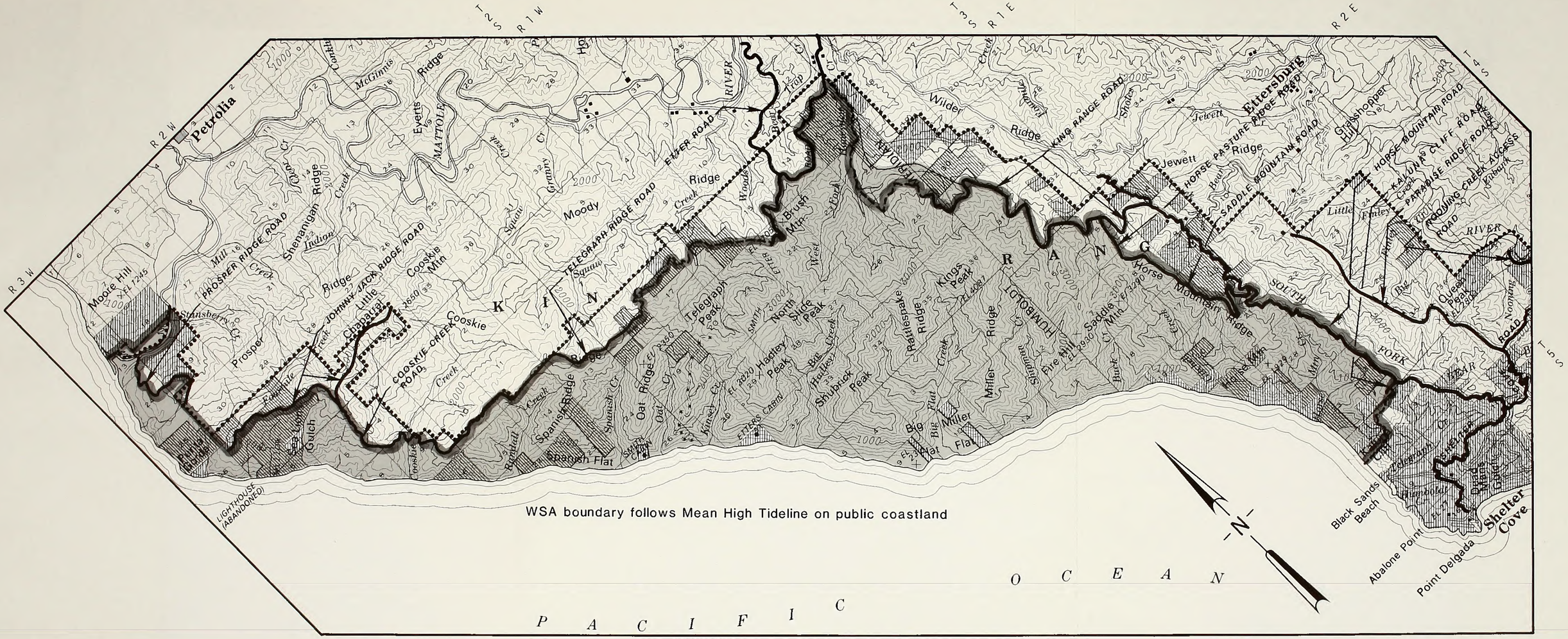
12. Same as Management Actions 31, 32, and 33 for the Proposed Action, page 2-8.

Land Acquisition Management Actions

13. Same as Management Action 34 for the Proposed Action, page 2-8.

Cultural Resource Management Actions

14. Same as Management Actions 35-38 for the Proposed Action, pages 2-8 and 2-9, except that the beach from just south of Kaluna Cliff to Gitchell Creek would be closed to vehicular use eliminating 280 visitor days per year.



LEGEND

- King Range National Conservation Area Boundary
- Wilderness Study Area Boundary
- Recommended Suitable for Wilderness
- Private Surface and Minerals
- Federal Surface/Private Mineral Rights

} within KRNCA and at mouth of Mattole River

- Roads

SCALE 3/4" : 1 Mile
Contour Interval 200 Feet

KING RANGE WILDERNESS STUDY AREA

All Wilderness Alternative

MAP 2-2

NO WILDERNESS/NO ACTION ALTERNATIVE

Under this alternative none of the 32,900 acres of public land in the King Range WSA nor the 735-acre old-growth addition would be designated wilderness. Instead, there would be a continuation of the existing King Range Management program as approved by the Secretary of the Interior in 1974. Livestock grazing would be permitted on grasslands in the northwest portions of the WSA at current levels. Timber management would be emphasized on about 7,000 acres in the southeast quarter of the WSA. The preservation and enhancement of wildlife would be emphasized in the northeastern portions of the WSA.

Vegetation Management Actions

1. Same as Management Actions 1-4 for the Proposed Action, page 2-1.

Timber Management Actions

2. Ten timber sales in the next 100 years involving 54.7 MMbf on 4,555 acres would be conducted in the northeastern quarter of the WSA and the old-growth preserve expansion. This would include implementation of Management Actions 6 and 7 for the Proposed Action (see page 2-2) and the construction of 7 miles of mainline and spur roads.

3. Timber stand improvements would be conducted on 150 acres per year north of Smith-Etter Road and near Telegraph Peak. These would consist of precommercial thinnings (300 cords of hardwood to be sold), brush conversions, and planting.

Wildlife Management Actions

4. Same as Management Action 10 for the Proposed Action, page 2-2.

5. Stands of tan oak, madrone, and Douglas-fir would be thinned to allow unrestricted big game movement on Horse-Mountain Ridge, Saddle Mountain, Fire Hill, Shubrick Peak, and Telegraph Ridge and amount to 30 acres per year.

6. Same as Management Actions 11-15 for the Proposed Action, pages 2-2 and 2-5.

Fire Management Actions

7. Same as Management Actions 17 and 18 for the Proposed Action, page 2-5.

Vehicle Access Management Actions

8. The Smith-Etter Road, Telegraph Ridge Road and Windy Point Road would be closed during wet weather from November 1 to March 31. Otherwise, all roads would be open to public vehicular use, except Saddle Mountain Road which would remain closed as per Management Action 21 for the Proposed Action and the last one-third mile of Smith-Etter Road before the beach which would be closed as per Management Action 20 for the Proposed Action, page 2-5.

All of the roads would receive annual maintenance by BLM, using scrapers and installing culverts as necessary. The beach from just south of Kaluna Cliff to Gitchell Creek would remain open to vehicular use which in that area would remain at 280 VUDs per year. Total motorized vehicle use for the WSA would increase to 2,200 visitor days annually.

(See Management Action 11, below.)

Recreational Management Actions

9. Same as Management Actions 27-29 for the Proposed Action, page 2-7.

10. With the exception of the development of the 1.5-acre staging area, the Management Action is the same as Management Action 30, page 2-6, for the Proposed Action.

Grazing Management Actions

11. Same as Management Actions 31-33 for the Proposed Action, page 2-8.

Land Acquisition Management Actions

12. Same as Management Action 34 for the Proposed Action, page 2-8.

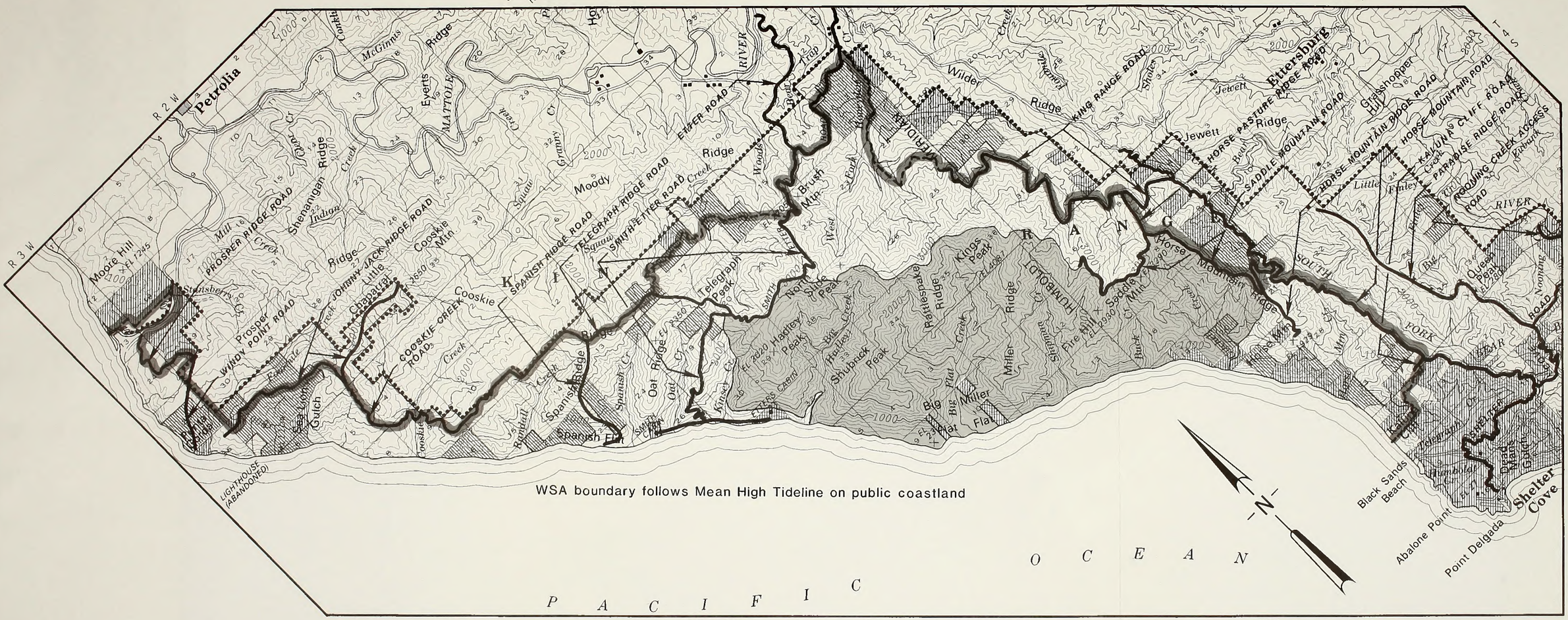
Cultural Resource Management Actions

13. Same as Management Actions 35-38 for the Proposed Action, pages 2-8 and 2-9.

PARTIAL WILDERNESS ALTERNATIVE (District Advisory Council Recommendation)

This alternative is the recommendation of the Ukiah District Advisory Council. Under this alternative, 14,000 acres of public land within the WSA would be recommended as suitable for wilderness; 28,900 acres in the WSA and the 735-acre old-growth addition would not be recommended suitable, but would be managed in accordance with the King Range Management Program (1974). As shown on Map 2-3 the northern boundary of the recommended suitable portion of the WSA would begin at the mean high tide at Hadley Creek (Big Creek) easterly to the 200-foot contour line, northerly at the 200-foot elevation to Kinsey Creek, easterly up Kinsey Creek to within 50 feet of the Smith-Etter Road, easterly 50 feet from the road to the ridgecrest, southerly at either the ridgecrest or the King Crest Trail, whichever is the farthest west, to Saddle Mountain Road, then southerly along the WSA boundary to the South Fork of Gitchell Creek, and then to the mouth of Gitchell Creek.

Under this alternative, 10 miles of roads within the nonsuitable portions of the WSA would be open for seasonal use. Three miles of road would remain open yearlong. The remaining 7 miles of road would be closed to all motorized vehicular use except BLM administrative or emergency use. The remainder of the WSA would be closed to motorized vehicular use; no roads would penetrate the area recommended suitable for wilderness.



LEGEND

- King Range National Conservation Area Boundary
- Wilderness Study Area Boundary
- Recommended Suitable for Wilderness
- Private Surface and Minerals
- Federal Surface/Private Mineral Rights
- Roads

(Private Surface and Minerals and Federal Surface/Private Mineral Rights: within KRNCA and at mouth of Mattole River)

SCALE 3/4" : 1 Mile
Contour Interval 200 Feet

KING RANGE WILDERNESS STUDY AREA

Partial Wilderness Alternative

(District Advisory Council Recommendation)

MAP 2-3

Livestock grazing would continue as established prior to designation and predator control would be allowed for those species that impact livestock operations either inside or outside the wilderness.

Vegetation Management Actions

1. Same as Management Actions 1-4 for the Proposed Action, page 2-1, except that none of Management Action 4 would occur in the area recommended suitable under this alternative.

Timber Management Actions

2. Same as Management Actions 2 and 3 for the No Wilderness/No Action Alternative, page 2-13, all in areas recommended nonsuitable for wilderness.

Wildlife Management Actions

3. Same as Management Action 10 for the Proposed Action page 2-2.

4. Same as Management Action 5 for the No Wilderness/No Action Alternative (page 2-13) except that the thinning would only take place on Telegraph Ridge, which is in the area recommended nonsuitable.

5. Same as Management Actions 11-15 for the Proposed Action, pages 2-2 and 2-5, except that the elk enclosure would not be within the area recommended suitable, the water box near Telegraph Ridge Road would not be in the suitable area, and about one-third of the stream barriers that would be removed would be in the suitable area.

Fire Management Actions

6. Same as Management Actions 17 and 18 for the Proposed Action, page 2-5.

Vehicle Access Management Action

7. Same as Management Actions 19-25 for the Proposed Action, pages 2-5 and 2-6 except the last one-third mile of the Smith-Etter Road would be open to motorized vehicle use. Motorized vehicle use would not be permitted on the beach, however. Substantial barriers would be constructed at the road's terminus to prohibit motorized vehicle use on the beach. Should the road become unmanageable (i.e., vehicles or motorcycles cross barriers and go onto the beach), the Smith-Etter Road would be gated and closed further up the mountain.

Recreational Management Actions

8. Same as Management Actions 27-29 for the Proposed Action, page 2-7.

Grazing Management Actions

9. Same as Management Actions 31-35 for the Proposed Action, page 2-8, except that all of the actions would take place in the area recommended nonsuitable.

Alternatives

Land Acquisition Management Actions

10. Same as Management Action 34 for the Proposed Action, page 2-8.

Cultural Resource Management Actions

11. Same as Management Actions 35-38 for the Proposed Action, pages 2-8 and 2-9.

CHEMISE MOUNTAIN WSA
(CA-050-111)

PROPOSED ACTION (ALL WILDERNESS)

All 4,340 acres of public land in the Chemise Mountain WSA are recommended for wilderness designation (see Map 2-4). Under this proposal, the area would remain closed to motorized vehicle use. Efforts to reintroduce the Roosevelt elk would continue and the area would be managed to enhance non-motorized recreation opportunities.

Vegetation Management Actions

1. Prescribed burning of brush will be implemented to maintain a fire dependent ecosystem. This will amount to about 10 acres every 3 years.

2. Field inventories will be conducted to identify the location of sensitive plant species and their habitat prior to these burns.

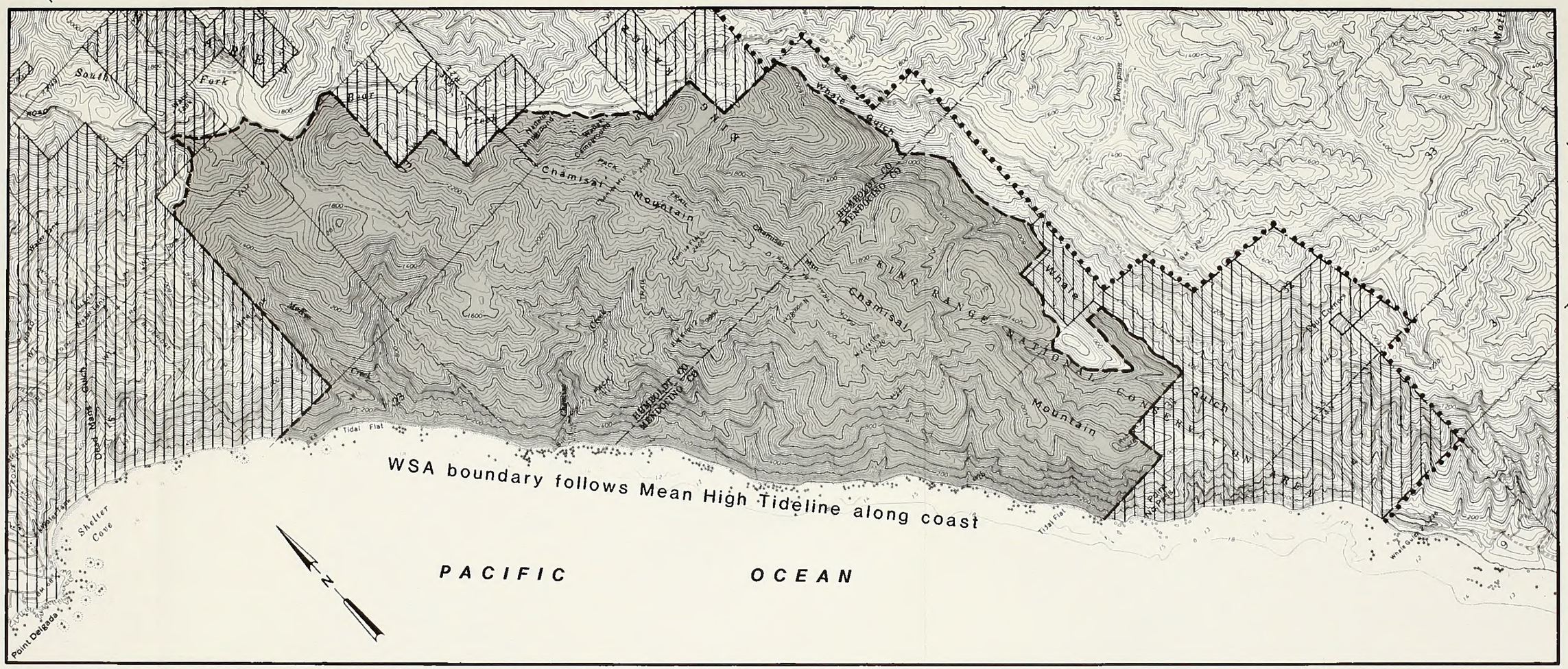
Wildlife Management Actions

3. The 40-acre existing elk enclosure will be removed and rehabilitated in 1988.

Fire Management Actions

4. A Fire Management Plan has been written for the entire King Range. It will become an addendum to the Wilderness Management Plan and, thus, will apply to both the suitable and nonsuitable portions of the WSA. Under this plan, fixed-wing aircraft, helicopters, and ground crews will be used for fire control. Cross-country vehicle travel will be permitted only where the terrain and soil conditions will permit such travel without damage to vegetative cover and engines will be prohibited from cross-country travel on slopes greater than 25 percent.

5. Two existing 100 feet-by-100 feet helispots will be maintained on the west side as a presuppression measure.


R 1 E
T 5 S
R 2 E
H.M.
M.D.M.
T 24 N
R 19 W
Chamisal Mountain
Chamisal Mountain
WSA boundary follows Mean High Tideline along coast
PACIFIC
OCEAN
Shelter Cove
Point Delgada
Tidal Flat
Whale Gulch
Mill Creek
Bear Creek
Dead Man Gulch
Wildcat Gulch
Thompson Creek
Mattole River
Mattole River
Chamisal Mountain
Chamisal Mountain
Chamisal Mountain

Recreation Management Actions

6. The 6-mile trail from Chemise Mountain to Sinkyone Wilderness State Park (Chemise Mountain Ridge Trail) will be completed increasing nonmotorized recreation use from 1,000 visitor days annually to over 1,500 visitor days.

7. The Hidden Valley Trail (2 miles) and the Chemise Mountain Ridge Trail (4 miles) will be maintained by hand annually. Visitor use along the trails will increase but will not exceed 1,500 visitor days annually. The WSA will remain closed to motorized vehicle use.

NO WILDERNESS/NO ACTION ALTERNATIVE

None of the 4,340 acres of public land in the Chemise Mountain WSA would be designated wilderness. The entire area would be managed as a Primitive Area in accordance with the King Range Management Program (1974).

Under this alternative, which is the recommendation of the District Advisory Council, extensive recreation such as hiking and primitive camping would be encouraged, but no camping facilities would be provided within the WSA. The trail system would be connected to the trails within the adjacent Sinkyone Wilderness State Park. Self-guided interpretive trails would be developed between the Wailaki and Nadelos Campgrounds. No logging would be permitted. Limited actions to control insects or disease would be allowed if commercial forestlands were threatened and the action did not significantly detract from the primitive qualities of the area. Any developments which risked degradation of natural values would not be permitted. However, the WSA would not be withdrawn from entry under the mining laws.

Vegetation Management Actions

1. Same as Management Actions 1 and 2 under the Proposed Action, page 2-18.

Wildlife Management Actions

2. Same as Management Action 3 under the Proposed Action, page 2-18.

Fire Management Actions

3. Same as Management Actions 4 and 5 under the Proposed Action, page 2-18.

Recreation Management Actions

4. Same as Management Actions 6 and 7 under the Proposed Action, page 2-21.

SUMMARY OF SIGNIFICANT IMPACTS

Tables 1 and 2 on the following pages provide a comparative summary of the major impacts of the Proposed Actions and Alternatives.

TABLE 1
COMPARISON OF IMPACTS OF THE PROPOSED ACTIONS AND ALTERNATIVES
FOR THE KING RANGE WSA

Issue-Related Resources	Proposed Action (Partial Wilderness)	All Wilderness Alternative	No Wilderness/No Action Alternative	Partial Wilderness Alternative
Impact on Wilderness Values	Wilderness values will be moderately impacted as a result of continued and projected vehicle use (from 1,800 visitor days annually to 2,150 visitor days) on the 13 miles of road which will remain open, and the surface disturbance/noise associated with logging 240 acres every 10 years over the next century. Naturalness characteristics will be lost on approximately 300 acres over the next 10 years and each succeeding decade until 2090. The perception of solitude will be impaired on 3,250 to 3,500 acres during the first decade and 750 to 1,000 acres each succeeding decade until 2090.	Closure of the 20 miles of existing roads traversing the WSA to motorized vehicular use and 1,800 visitor days of motorized recreation use and elimination of timber harvests on 6,985 acres would have a moderate benefit on the area's wilderness values.	Wilderness values would be moderately impacted as a result of continued and projected vehicle use (from 1,800 visitor days annually to 2,150 visitor days) on the 16 miles of road which would remain open, and the surface disturbance/noise associated with logging 700 acres every 10 years over the next century. Naturalness characteristics would be lost on approximately 900 acres over the next 10 years and each succeeding decade until 2090. The perception of solitude would be impaired on 4,500-5,000 acres during the first decade and 1,500-2,000 acres each succeeding decade until 2090.	Wilderness values would be moderately impacted as a result of continued and projected vehicle use (from 1,800 visitor days annually to 2,150 visitor days) on the 13 miles of road which would remain open, and the surface disturbance/noise associated with logging 700 acres every 10 years over the next century. Naturalness characteristics would be lost on approximately 900 acres over the next 10 years and each succeeding decade until 2090. The perception of solitude would be impaired on 4,500 to 5,000 acres during the first decade and 1,500 to 2,000 acres each succeeding decade until 2090.
Impact on Motorized Recreation Use Levels	Motorized recreational use will be slightly enhanced--13 miles of road within the WSA will remain open and continue to be maintained, and motorized use levels will increase from 1,800 visitor days annually to 2,150 visitor days.	Motorized recreational use would be foregone on the roads within the WSA eliminating 1,800 visitor days annually. Impacts would be moderate due to the limited amount of opportunity on public lands surrounding the WSA.	Motorized recreational use would be slightly enhanced--16 miles of road within the WSA would remain open and continue to be maintained, and motorized recreational use levels would increase from 1,800 visitor days annually to 2,150 visitor days.	Impacts would be the same as for the Proposed Action.
Impact on Livestock Grazing Management	Road closures and vehicle use restrictions along the Smith-Etter Road and Spanish Ridge Road will have a minor negative impact on livestock grazing management.	The impacts would be the same as for the Proposed Action.	The impacts would be the same as for the Proposed Action.	Closure of Spanish Ridge Road would have a negligible adverse impact on livestock grazing.

TABLE 1 (Cont.)

Issue-Related Resources	Proposed Action (Partial Wilderness)	All Wilderness Alternative	No Wilderness/No Action Alternative	Partial Wilderness Alternative
Impact on Timber Management	35 MMbf of merchantable timber will be foregone and 2,125 acres of commercial forest land (CFL) will be eliminated from timber harvest which will have a negligible adverse impact on the region's economy.	54.7 MMbf of merchantable timber would be foregone and 4,555 acres of CFL would be eliminated from timber harvest which would have a negligible adverse impact on the region's economy.	54.7 MMbf of merchantable timber would be harvested and 4,555 acres of CFL would remain available for timber production which would moderately benefit the area's timber management program and negligibly benefit the region's economy.	The impacts would be the same as for the No Wilderness/No Action Alternative.
Impact on Roosevelt Elk	Reintroduction and management efforts will be slightly enhanced by the continued closure of the area to motorized vehicular use (except on the 13 miles of designated routes of travel) and the use of motorized vehicles for elk transplants and herd maintenance.	The impact would be the same as for the Proposed Action.	The impact would be the same as for the Proposed Action.	The impact would be the same as for the Proposed Action.
Impact on Salmon and Steelhead Spawning and Nursery Streams	Salmon and steelhead habitat will receive moderate positive impacts from various habitat improvements constructed in or near the river.	Overall, the impacts would be the same as for the Proposed Action; vehicle closures and the elimination of timber harvests, however, would enhance the quality of spawning and nursery streams.	The impacts would be the same as for the Proposed Action.	The impacts would be the same as for the Proposed Action.
Impact on Archaeological Resources	There will be a minor negative impact to the area's archaeological resources as a result of increased pedestrian use.	There would be a minor positive impact to the area's archaeological resources as a result of eliminating motorized access and increasing monitoring.	The impacts would be the same as for the Proposed Action.	The impacts would basically be the same as for the Proposed Action, except that there would be a minor increase in pressure on archaeological resources because the Smith-Etter Road would be open to the beach.

TABLE 2
COMPARISON OF IMPACTS OF THE PROPOSED ACTION
AND ALTERNATIVE FOR CHEMISE MOUNTAIN WSA

Issues	Proposed Action (All Wilderness)	No Wilderness Alternative
Impacts on Wilderness Values	The area's wilderness values will be retained.	The area's Primitive Area designation would be maintained and its wilderness values retained.
Impacts on the Reintroduction and Management of Roosevelt Elk	Impacts on the reintroduction of elk will be negligible. Minor beneficial impacts from prescribed burning will be partially offset by minor disturbance from increased visitor use of the area.	Impacts would be the same as for the Proposed Action.

Chapter 3

Affected Environment

CHAPTER 3

AFFECTED ENVIRONMENT

This chapter briefly describes each WSA and the resources that would be impacted by the alternatives including the Proposed Action. Descriptions are only as detailed as needed for the reader to understand the effects of implementing the alternatives. Where impacts to resources would be slight or nonexistent, descriptions are brief or are omitted.

More detailed descriptions of the resources in the study area and of regional socioeconomic conditions appear in the planning documents for the planning area. Copies of these documents may be reviewed in the Ukiah District Office or the Arcata Resource Area Office.

KING RANGE WSA
(CA-050-112)

The King Range WSA contains 32,900 acres of public land and is located south of the mouth of the Mattole River along the Pacific Coastline within the designated King Range National Conservation Area (KRNCA).

The area comprises a diverse landscape ranging from miles of shoreline to steep, rugged mountains and drainages (see Photos 3-1 and 3-2). The two most prominent topographic features are the 25 miles of remote, nearly inaccessible coastline running from the mouth of the Mattole River south to Shelter Cove, and the King Range mountains rising to 4,088 feet at Kings Peak in less than 3 miles. The area is very steep and rugged with many short, steep streams running to the ocean. Rainfall is abundant, and severe landsliding results from unstable soils and rock formations. Streams branch in a dendritic pattern providing narrow, short ridges and steep canyons. The eastern slopes of the range, while also steep and rugged, are not as severe as the western side. Streams such as Honeydew Creek drain less abruptly into the northerly flowing Mattole River. West-facing slopes are densely covered with brush. Conifers are generally found on north-facing slopes. Grassy areas are found in the northern portion and at large flat areas along the coast. The beaches abound with sea birds, marine mammals, and associated plant life.

WILDERNESS VALUES

Naturalness

The bulk of the area generally retains its primeval character. The northern boundary of the Wilderness Study Area was changed in 1979 to exclude those parts of the intensive inventory unit where man's activities have degraded the apparent naturalness. The Lighthouse Road and Jeep Road up to Barksdale Table form the boundary in the far north, excluding the private lands to the east. The boundary follows the KRNCA line south to the road along Johnny Jack Ridge all the way to Cooskie Creek, thus excluding areas impacted by past logging operations. The boundary then follows

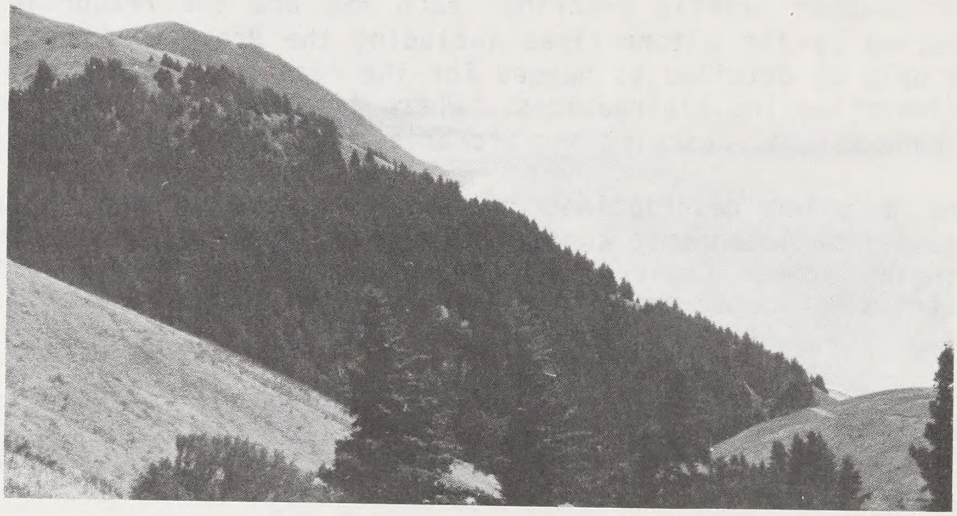


Photo 3-1. King Range WSA, looking south from the Smith-Etter Road. Kaluna Cliff is just left of photo center. Black Sands Beach and Shelter Cove are in the background.

Photo 3-2. Grazing land in the northern portion of the King Range WSA. The Punta Gorda Lighthouse (center) was in use from 1912 to 1951.

Cooskie Ridge Road and Cooskie Ridge to Moorehead Ridge and Fiddle Prairie to the Smith-Etter Road, from the Smith-Etter Road to Honeydew Creek and up Bearwallow Ridge to the King Range Road. A new boundary was also chosen along the south to exclude permanent developments near Shelter Cove and follows the road north of Pepperwood Spring out to Kaluna Cliff. The remainder of the area is relatively free from man's influence, its natural character intact. Man's impacts, which include existing roads (10 miles of which penetrate into the WSA), primitive ways, grazing, some logging, and cabins (not determined to be permanent because they are subject to possible acquisition) are concentrated toward the northern half of the WSA but are substantially unnoticeable from most locations due to terrain variety and sheer distance. Overall, this remaining area appears to have been affected primarily by the forces of nature.

Opportunities for Solitude

The diverse, rugged topography and dense vegetation offer an excellent degree of visual screening that allows the area to accommodate a large number of visitors without reducing opportunities for solitude. Although the topography tends to concentrate recreation activities to the beach area and to developed trails in the mountains, opportunities for solitude are still excellent. Views of the vast Pacific Ocean and surrounding areas enhance opportunities to experience solitude.

The presence of vehicles traveling on Smith-Etter Road intrude upon portions of the WSA and diminish the opportunities for solitude. Existing authorized use of motor vehicles on the beach from Gitchell Creek to the southern boundary of the WSA (by both private owners and the public) reduces opportunities for solitude. However, such disturbances affect less than 5 percent of the area of the WSA and occur only occasionally.

Opportunities for Primitive and Unconfined Recreation

The King Range WSA provides outstanding opportunities for primitive and unconfined recreation. The network of trails, roads, and beach access offer opportunities for very diverse types of recreation over a large area including hiking, camping, surf fishing, sightseeing, and other forms of dispersed recreation.

Special Features

The special features of the King Range WSA are its unique geology and cultural resources. These are discussed below starting on page 3-12.

LAND OWNERSHIP

Land ownership at present within this area is a mixture of private and public land. Approximately 28,000 acres are public, 1,100 acres are private and about 2,800 acres are split-estate--Federal surface/private mineral rights (Map 2-1). The majority of the private land is found along the coast with concentrations at the north and south ends of the WSA. Approximately 10,800 acres of the 28,000 acres of public were acquired from private ownership over the last 12 years.

TIMBER RESOURCES

The King Range National Conservation Area (KRNCA) is a rugged, isolated brush- and timber-covered mountain range in Northern California. The present condition of the commercial forest land (CFL) is mainly one of neglect. Wildfires have been the controlling factor, allowing hardwood/brush to compete successfully with the Douglas-fir for control of the various sites. Timberlands on the west side of the King Range are relatively undisturbed due to the steep terrain and general lack of access. There are approximately 12,000 acres of CFL on this side of the KRNCA. The eastern slope is not as steep as the west slope and contains several areas that are producing good quality commercial timber. The east side contains approximately 25,000 acres of CFL with about half of it in a cutover condition.

Douglas-fir is the major commercial species, with sugar pine scattered at the higher elevations. Tan oak, madrone, and alder make up the majority of the hardwood component. Fir reproduction is evident throughout the area, although hardwood brush dominates a large portion of the total King Range unit.

The timberlands on the west side of the WSA are classified for protective management compatible with wildlife, recreation, and visual resources. The timberlands on the east side are intended for timber management. An old-growth reserve has been established in Honeydew Creek; about 2,680 acres with 13 MMbf of standing volume have been withdrawn from the available commercial forest land base.

The majority of the CFL identified for timber production in the King Range National Conservation Area lies to the southeast of the WSA. The acreage and standing volume of commercial forest land within the inventoried WSA is 6,500 acres with 60 MMbf. (If harvested today this timber would be worth about $4.7 million on-the-stump.) These and other relevant volume and acreage figures are shown in Table 3.

Table 3. Timber Volume and Commercial Forest Land Acreages for Areas Relevant to the Alternatives for the King Range WSA

	Inventoried WSA	Old-Growth Reserve	Old-Growth Reserve Expansion	Telegraph Peak	Section 13 Delegation
Acres of CFL	6,500	2,680	735	2,130	300
MMbf	60	13	7.7	19.7	0

VEGETATION

Broadly speaking, the King Range Wilderness Study Area (WSA) falls within the Pseudotsuga menziesii province of the temperate mesophytic forest region (Daubenmire, 1978). Specifically, the WSA is composed of four plant communities: mixed evergreen forest, coastal prairie, manzanita/ceanothus chaparral and northern coastal scrub (Barbour and Majors, 1977). In addition, there is the Mattole dune system at the mouth of the Mattole River.

The vast majority of the WSA (23,000 acres) is dominated by the mixed evergreen forest, inclusive of its hardwood seral stages. It is best described as the north coast range phase of the Pseudotsuga-hardwood forest (Sawyer et al. 1977). This plant community forms a very complicated vegetation mosaic with the coastal prairie to the north and west and manzanita/ceanothus chaparral on the more xeric sites to the south and east. Though the nature of the grassland-hardwood-conifer mosaic is not well understood, it is known that it has been shaped by a long history of fire, grazing and, more recently, logging. This is in addition to the more mundane causal agents of climate and topography.

Douglas-fir (Pseudotsuga menziesii) dominates the overstory in the climax situation with tan oak (Lithocarpus densiflora) commonly forming a secondary canopy in the understory. Other understory species include madrone (Arbutus menziesii), deciduous and live oaks (Quercus spp.) and California huckleberry (Vaccinium ovatum). Barrows et al. (1983) reported a typical successional overview in Honeydew Creek watershed showing old-growth Douglas-fir in the drainages and north slopes with an elevational transition through tan oak and madrone and finally progressing to a ridgetop community of manzanita (Arctostaphylos spp.).

The coastal prairie (about 4,000 acres) is an important component of the King Range WSA. It is complex due to the varying degrees of successional transition away from its pristine state. In the extreme northwest, the bluffs above the mouth of the Mattole River support a mix of native perennial grasses such as California oatgrass (Danthonia californica), seacliff bluegrass (Poa unilateralis), and pacific reedgrass (Calamagrostis nutkaensis), as well as introduced perennials (e.g., velvet grass, Holcus lanatus, and hairy oatgrass, Danthonia pilosa) and introduced annual genera common throughout cismontane California (e.g., Bromus, Festuca, and Cynosurus).

The coastal prairie continues along the western slope of the King Range to Big Flat as a discontinuous mosaic periodically interrupted by northern coastal scrub (e.g., coyote brush, Baccharis pilularis ssp. consanguinea, and poison oak, Toxicodendron diversiloba) and mixed evergreen forest. As one travels inland and upward, remnant indigenous perennials are reduced to isolated pockets such as the Idaho fescue (Festuca idahoensis) populations on Spanish Ridge. Introduced annuals dominate the xeric grassland sites and introduced perennials occupy the mesic sites not taken by mixed evergreen forest.

The fourth major plant community is manzanita/ceanothus chaparral which totals about 6,000 acres. It is found mainly on inland sites where soil moisture regimens are too dry to support mixed evergreen forests. Characteristic climax taxa are members of the genera Arctostaphylos and Ceanothus.

Within the King Range WSA, there exist four significant botanical resources:

1. The Mattole dune system is of high ecological significance. It is unique in that the aggressive introduced European dune grass, Ammophila arenaria, has not yet encroached on the Mattole dunes as it has on most coastal dunes north of San Francisco.

2. The leafy reedgrass, Calamagrostis foliosa, found along the WSA's coastal strand is another botanical resource. This species is a U.S. Fish and Wildlife Service candidate for listing as threatened of extinction (Federal Register, Vol. 45, No. 242, 15 December 1980); it is considered sensitive by BLM.

3. Remnant populations of the once ubiquitous, unaltered coastal prairies are a special botanical value. Isolated stands of such species as California melic (Melica californica) and Idaho fescue in today's coastal prairie provide an important window into California's floristic past.

4. Within the WSA are approximately 1,500 acres of old-growth Douglas-fir forest located in the Honeydew Creek watershed. The old-growth forests provide us with an opportunity to observe the pristine ecosystem. These forests not only support old-growth dependent animal species but promote regional biological diversity, conserve plant and animal genetic stock and provide opportunities for scientific research.

WILDLIFE

The general vicinity of the King Range National Conservation Area contains a unique mixture of terrestrial and marine habitat, supporting a wide diversity of animal species. Offshore rocks, kelp beds, and tidal areas are inhabited by seals, sea lions, and a variety of marine birds and play an important role in the life cycle of a variety of fish species. The terrestrial Douglas-fir forest and coastal chaparral habitat types support populations of black-tailed deer, black bear, quail, blue grouse, and a wide variety of nongame birds and mammals. Numerous raptors and a variety of fur-bearers, such as river otter and mink occupy the area. Several threatened wildlife species have been observed in the area, including the brown pelican, bald eagle, and peregrine falcon.

Terrestrial Wildlife

Black-tailed deer are present in the KRNCA, but populations move locally in response to weather changes and forage "green-up." During the period from October to May the grassland communities receive an influx of deer seeking succulent vegetation. The chaparral communities provide deer browse yearlong.

Environment

There are no direct estimates of deer populations or herd composition for King Range. The proportion of deer numbers to habitat acreage can only be estimated from the condition of the vegetation in the primary deer forage areas and concentration areas. Heavily used areas, such as riparian habitat and grassy openings, contain over 100 deer per square mile. More lightly used areas, such as the interior of the chaparral stands, contain over 10 deer per square mile. It can be concluded that the concentration areas are overpopulated and deer habitat is declining.

Black bear are present over the entire King Range, but are most often observed north of Big Flat and King's Peak. Bears prefer the Douglas-fir forest, particularly the riparian areas where berry-producing shrubs are abundant.

Mountain lion are known to inhabit the KRNCA, but no population estimates have been made. Specific use areas have not been identified. Bobcat and coyote are apparently present in large numbers, based on observed sign and reports from local landowners.

At present an ambitious attempt is being made to reestablish a viable population Roosevelt elk in the King Range by transplanting animals from the Redwood National Park and Prairie Creek State Park. To date, over 25 elk have been successfully transplanted.

California and mountain quail, blue grouse, gray squirrel, brush rabbit, black-tailed jackrabbit, mourning dove, and band-tailed pigeons constitute the upland game species in the KRNCA. All are distributed throughout the King Range, but each species demonstrates definite habitat preferences.

The entire King Range is apparently a wintering area for many raptors, particularly sharp-shinned and Cooper's hawks. Turkey vultures summer in the KRNCA and leave in September for more southerly wintering areas. No complete survey of osprey use has been made, but nests have been identified near the Mattole River, Big Finley Creek, and Bear Creek. Several osprey nests were destroyed north of Nooning Creek as a result of logging activities in the late 1960's.

Blue heron, river otter, and mink are found in the immediate vicinity of the larger streams, in particular Honeydew Creek and the Mattole River.

Aquatic Wildlife

The Mattole River is the major inland terminus for nine tributary streams, whose headwaters lie within King Range. Additionally, 12 coastal streams flow directly into the Pacific Ocean. Many of these streams provide spawning and rearing habitat for steelhead, silver salmon, and king salmon. About 80 miles of the King Range tributaries contain sufficient water to support fish populations. All of these streams are free-flowing, but contain some log jams and waterfalls which limit the passage of fish.

Coastal streams, which flow directly into the ocean, arise high on the western slopes of King Range. Some headwaters approach the 4,000-foot elevation. Stream gradients often exceed 5 percent and streams are often less than 3 miles in length. Stream bottoms are composed of large alluvial material, containing large amounts of rock and fines that fill in pools and provide unsatisfactory salmonoid spawning areas.

The inland streams flowing into the Mattole offer much better salmonoid habitat. Drainages are larger and, while headwaters are often as steep as the coastal streams, the inland stream gradients moderate quickly so that there are long stretches of riffle area and sizeable pools.

Rearing of juvenile steelhead and salmon occurs to some extent in most streams, but low summer water flows and high temperatures limit overall rearing capacity. Bear Creek and Honeydew Creek contain numerous juvenile steelhead during the summer since pool habitat and cool water temperatures are not limiting. Coastal streams also contain juvenile fish, but these migrate to the ocean immediately after the first high water in the fall.

Resident fish species are limited to sculpin and rainbow trout. Sculpin are present in every stream in low to moderate numbers. Use of stream habitat by resident rainbow trout is hard to determine because of overlaps with steelhead habitat. Whale Gulch is the only stream restricted solely to resident trout. Lampreys migrate into many of these streams and nests have been observed in Honeydew Creek.

Marine Wildlife

There are 25 miles of coastline in the WSA, providing areas of offshore rock, kelp beds, and tidal habitat. While these areas are outside of the WSA they contribute to the uniqueness of the area. Offshore rocks are concentration areas for Steller and California sea lions, harbor seals, and a variety of sea birds. Rocks used as rookeries by cormorants are identified in U.S. Fish and Wildlife Service inventories. The entire coastline is utilized by marine wildlife, but Gorda Rock and the general Punta Gorda offshore area is an important concentration area for the Steller sea lion and other marine mammals.

The intertidal zone between the Mattole River and Whale Gulch (south of Chemise Mountain) was designated as an Area of Special Biological Significance (ASBS) by the California Water Resources Control Board. The concept of "special biological significance" recognizes that fragile or valuable biological communities deserve special protection by maintenance of natural water quality conditions. The King Range ASBS is recognized as being able to provide valuable baseline data to the scientific community because of the undisturbed nature of the coastal zone.

Sensitive Wildlife Species

Endangered wildlife species in the KRNCA include the brown pelican, bald eagle, and peregrine falcon. The spotted owl, a BLM sensitive species, is present in several forested areas.

Brown pelican use of the area includes such nonbreeding activities as loafing and resting on rocks of the near shore marine environment. No known active nesting sites of the bald eagle or peregrine falcon occur within the King Range National Conservation Area. Primary use of the area by the bald eagle is minor foraging in conjunction with the winter anadromous fish spawning runs. The area also affords the peregrine falcon winter habitat associated with migratory activities. Spotted owls have been observed or heard calling in the Bear Creek, Big Finley Creek, and Honeydew Creek watersheds. These observations were made from 1981 to 1983.

Honeydew Creek Wildlife Preserve

The Honeydew Creek Wildlife Preserve is located in the northern portion of the study area and contains approximately 2,980 acres. Mature to old-growth stands of Douglas-fir are found on approximately 1,500 acres. These timber stands occur along the drainages and on some north-facing slopes. South-facing slopes and higher elevations contain pole size stands of Douglas-fir, hardwood stands of tan oak, madrone, and canyon live oak and dense stands of manzanita and other shrub species near ridgelines. High interest species occurring in the area include wintering bald eagles, spotted owls and other old-growth dependent species, black bear, mink, and anadromous fish. The area's wildlife values and other natural values led to the area's nomination as a Man and the Biosphere Reserve in 1981. However, the site was not designated a Man and Biosphere Reserve because of a lack of long-term baseline data.

RECREATION

The King Range is generally steep and rough, creating a highly difficult terrain for hikers. Ridgetops and some fairly level open areas in the more northerly portions of the WSA provide the best foot access. Recreation use is largely confined to late spring, summer, and early fall seasons due to the rainy and windy conditions which typify much of the area during the winter.

General recreation activities consist of hiking, backpacking, ORV riding, hunting, fishing (surf and stream), wildlife viewing, nature study, and photography. Total recreational use is estimated to be approximately 7,100 visitor days per year. About 75 percent (or 5,300 visitor days) of these visits are for hiking and backpacking and other forms of nonmotorized recreational use. Roads, some well defined, provide motorized access along the eastern and northern portions of the WSA. Approximately 1,500 visitor days of motorized vehicle use presently occur on these roads. Nearly half of these visitor days along the roads are devoted to hunting. In addition, the 3-mile stretch of beach from just south of Kaluna Cliff to Gitchell Creek is open to vehicles and receives about 300 visitor days per year. The remainder of the beach is closed to motorized vehicles from Gitchell Creek north to the Mouth of the Mattole.

The 16-mile King Crest Trail provides foot and horse access along the main coastal ridge north of Shelter Cove. The 21 miles of beach closed to motorized access affords hikers/backpackers/anglers the opportunity for a primitive, yet fairly accessible physical setting. Over 60 percent (3,200 visitor days) of the nonmotorized recreational use occurs along the beach.

The remainder of nonmotorized recreation use (2,100 visitor days) is spread over the nearly 30 miles of trails that traverse the WSA. In addition to the King Crest Trail which receives the majority of use (approximately 900 visitor days per year), trails include the Lightning Trail (3 miles long, 600 visitor use days annually), the Spanish Ridge Road/Trail (3 miles long, 300 visitor use days annually), and the Buck Creek Trail (3 miles long, 300 visitor use days annually). Nearly half of these visitor days are devoted to hunting. Hunting pressure is greatest in the north one-third of the WSA during the regular deer season. There is only occasional hunting for other game animals and birds. While recent acquisitions have made more land available for hunting a lack of access restricts public use.

VISUAL RESOURCES

The King Range represents a landscape diversity rare and unique. Rising from a coastline of massive rocks, cliffs, tide pools, and beaches to rugged mountains exceeding 4,000 feet in elevation in less than 3 miles gives credence to its claim as the "Lost Coast." The landscape itself takes on a variety of characteristics.

To the north, the King Range is bounded by the estuary of the Mattole River. This broad river plain meets the coastline at a large sandy beach that extends south to the historic Punta Gorda Lighthouse. Along this coastline the cliffs and hillsides rise abruptly and are sharply dissected by numerous drainages. The upslope areas are generally grass covered to the north with coastal chaparral and Douglas-fir in the drainages. Progressing southward this western slope of the study area is dominated by Douglas-fir and other mixed conifers rising to the ridge crest of Kings Peak. Several coastal terraces break the rugged coastline at Spanish Flat, Big Flat, and Miller Flat. Here broad, grassy flats extend to the beaches. The southern boundary of the study area is just above Telegraph Creek and the area known as just south of Kaluna Cliff. Here the beaches are covered with black sand and gravel giving the beach a very dramatic appearance.

The inland, east slope is typical of the coastal range. This area is composed of mixed conifer forests, tan oaks, and madrones, as well as a rich diversity of riparian species in the drainages. The overall sense of this portion of the study area is that of dense forested slopes steeply rising to the crest of the King Range.

The area has long been recognized as one of the most unique and scenic stretches of the California coastline. The rugged and remote landscape has seen few intrusions. Roads are limited in this area, and only a few ranch cabins occupy the coastline. In the Four Mile Creek and Sea Lion Gulch drainages and along the west slope, skid trails and stump fields are reminders of past logging activities. The east slope supports more conifers and has seen a greater amount of timber harvest, but is still limited by the steep terrain.

The BLM's Visual Resource Management (VRM) system rates this as a landscape of high scenic quality along the coastline and the Mattole River Valley. The upland areas are only slightly less distinctive and overall are rated as moderate to high scenic quality. The area's remoteness limits

viewing to the recreational users who wander the beaches and trails and to local residents. These viewers all maintain a high degree of sensitivity towards this unique coastal range. Views range from the intimate foreground to the background of splendid vistas. Views into the area are afforded from only three county roads, Wilder Ridge Road, Shelter Cove Road, and Horse Mountain Road, and the Shelter Cove community.

The VRM system establishes management classes that set various standards for maintaining the visual resource. The entire coastline is designated VRM Class 2, which precludes management activities from being evident in the characteristic landscape. The Mattole River Valley and the east slope are managed as VRM Class 3, which allows management activities to be visible but they must remain subordinate to the existing landscape.

LIVESTOCK GRAZING

The King Range WSA includes approximately 11,600 acres of grazing leases that provide 3,000 animal unit months (AUMs) of forage for domestic livestock. Five grazing leases occur within the WSA. Extant range improvements consist of about ten miles of fence, four barns and associated corrals, five enclosures, twenty utilization cages, and four water troughs. Grazing activity is limited to the northern half of the WSA.

The grasslands of the King Range have been ranched for over a century. However, grazing on Federal land was not authorized within the WSA until 1983 (after determination of nonimpairment) because land that was in public ownership prior to 1983 was so scattered that it was not manageable. Since 1983 much of the land has been acquired by BLM and grazing has been determined to be acceptable under multiple use management.

MINERAL AND ENERGY RESOURCES

A Mineral Resource Potential Report was prepared by the U.S. Geological Survey and the Bureau of Mines for the King Range and Chemise Mountain WSAs to identify energy and mineral resources as defined by the wilderness study policy.

The summary of the report states that the potential for economic development of energy-related or metallic mineral resources in the King Range and Chemise Mountain Wilderness Study Areas is low to moderate as indicated by geologic, geophysical, and geochemical investigations.

No oil or gas seeps or coal seams were detected within the King Range or Chemise Mountain Study Areas. The low porosity and permeability of the Franciscan sandstones that underlie these areas indicate a very low potential for oil or gas. The geothermal resource potential of these areas is also low.

Minor manganese resources occur just outside of the southeast corner of the King Range WSA near Queen's Peak. The manganese forms small strata-bound deposits associated with radiolarian chert and pillow basalt. The known deposits are too small and the manganese too low in concentration for further economic exploitation. Similar manganese mineralization may

be within the belt of melange in the southwest corner of the King Range WSA and within the Chemise Mountain WSA, but economic deposits are unlikely.

Although there has been historical base and precious-metal exploration activity north of the King Range in the Mattole River drainage, geologic and geochemical field data indicate almost no gold potential and low potentials for lead, zinc, copper, and silver. One high-grade vein and several minor veins containing lead, zinc, copper, and silver were discovered at Point Delgada immediately south of the King Range WSA by the U.S. Geological Survey and Bureau of Mines. The vein mineralization is Miocene and cuts cretaceous basalt flows, dikes, flow breccia, and younger overlying sedimentary rocks of the King Range. The vein mineralization at Point Delgada could be remobilized from more extensive unexposed stratabound base-metal mineralization at depth. Traces of lead and zinc detected within the King Range WSA may have similar stratabound or vein origins, but no resource potential is indicated. Minor copper mineralization with associated lead, zinc, and manganese anomalies within the Chemise Mountain WSA is of low economic potential because of the sheering, isolation, and particularity of the basaltic and cherty rocks within the melange that hosts this mineralization.

Currently, there are 14 lode claims within the King Range National Conservation Area which were filed in 1982; these are east of the King Range WSA near Queen Peak.

The area has been identified as having potential for wind energy development. There are no leases at the present time. The area is unlikely to be considered prime resource for development in the near future due to limited geographic extent of the resource and geographic isolation.

CULTURAL RESOURCES

The study area as a whole has been the focus of several field investigations for cultural (principally prehistoric) resources (Fredrickson 1975; Levulett, 1976a and 1976b, 1979, 1981a, 1981b, and 1982). The information provided in these reports when taken into consideration with more regional works (Hildebrandt 1981, Levulett 1977) and recent studies (Roscoe 1983) indicate that the coastal strip specifically contains prehistoric archaeological values of national significance.

A minimum of 45 prehistoric sites containing one or more discrete loci and ranging in size from 540 square feet to 6 acres have been recorded within the coastal strip of the study area. Collectively, these sites chronicle the entire spectrum of material-oriented aboriginal activity over the last 3,000 years. The assemblage is unique as it reflects an area, which at least in the later prehistoric period, fills a niche spanning Northwest Coast cultural adaptations (e.g., ocean-going canoes, intensive sea mammal exploitation, and a relatively high reliance on elk) and the more generalized foraging adaptations of the California cultural province (Hildebrandt, 1981: 187-193).

Not surprisingly, the area also exhibits interfaces beyond the material culture. The presence of obsidian from northeastern California and from the Lake County area to the south indicates trade and, by inference, some

affinity to their Athabascan relatives or ancestral Yukian and Hokan/ Siouan, i.e., Pomo, neighbors, respectively. Sufficient data exist within the archaeological deposits to assess these ethnographic relationships as well as earlier aboriginal adaptations, relationships, and movements.

The study area, due to its remote location, offers an opportunity unparalleled in California (if not the west coast) to interpret coastal prehistory due to the relatively high degree of preservation. Generally, coastal archaeological sites possess better preservation of organic, especially fauna, materials than inland sites. The subject prehistoric sites contain terrestrial as well as marine fauna information and, when coupled with the high level of impacts to coastal archaeological sites elsewhere due to modern development, reinforce the significance or rarity of the assemblage.

Moreover, the relative antiquity of these coastal sites (at least 3,000 years) surpasses most known coastal northern California archaeological sites and presents an enigma, i.e., relative stability, in a geomorphologically active area. These factors add considerably to the intrinsic scientific and heritage values.

Historic, i.e., American period, features consist of the concrete and steel remains of the Punta Gorda lighthouse and oil house as well as a few Pre-WW-II cabins, sheds, and corrals used until recently by range operators. The Punta Gorda lighthouse, an entry on the National Register of Historic Places, now stands in silent witness to the thriving and sometimes treacherous maritime trade which once plied the coast of northern California. The various features including numerous dilapidated fences which relate to use of the range are generally features of the cultural landscape which add character but not additional significance to the study area.

GEOLOGY

The King Range is an area that is a case study of erosional dynamics. The severe and persistent erosion includes dissection due to youthful, steep gradient coastal streams and mass wasting, e.g., numerous slumps and slides. The primary reason for such widespread erosion is the orogenic uplift of this section of coastline due to tectonic movement. The study area is located on the leading edge of the North American (continental) plate. As the plate moves westerly, it grinds over the Pacific plate intensively fracturing the bedrock as it lifts skyward. The crushed, steep King Range is subsequently eroded by gravity and the power of running water. High annual rainfall and the incessant gnawing of the Pacific Ocean exacerbate the situation.

Paradoxically, the same set of erosional parameters has preserved some unusual and scientifically valuable features. Along this coastline earlier wave-cut terraces can be identified. The terraces have been preserved by episodic uplift. A recent uplift has been noted on Miller Flat immediately south of Big Flat Creek. Boulders which once spewed into the ocean from Big Flat Creek now trace a former beach edge well above the reach of the ocean. Radiocarbon age dating reveals that the shoreline has risen some 66 feet over the last 6,000 years. Similarly, boulders and cobbles which once formed a rocky beach are preserved in a coastal bluff near Sea Lion Gulch, capped by a prehistoric landslide replete with logs and other flora of the former hillside.

CHEMISE MOUNTAIN WSA
(CA-050-111)

WILDERNESS VALUES

The Chemise Mountain WSA contains 4,340 acres of public lands and is located within the designated King Range National Conservation Area just south of Shelter Cove (Photo 3-3). It includes the 3,941-acre Chemise Mountain Primitive Area (Photo 3-4) and some of the contiguous roadless lands. The southern boundary is contiguous to the Sinkyone Wilderness State Park. The east is bounded by the Chemise Mountain Road and Whale Gulch; the north by the Shelter Cove Road; and the west by the Pacific Ocean.

General topography is steep and rugged. Elevation drops 2,600 feet to the ocean in about one-half mile. Major drainages are Chemise Creek and Whale Gulch Creek, both of which drain directly into the Pacific Ocean. The west slope is very steep with Douglas-fir dominating the riparian vegetation in the drainages and chaparral on the saddles. There are also several open, steep, grassy meadows. Undergrowth on the east slope was destroyed by fire in 1973, leaving tan oak, madrone, and Douglas-fir.

Naturalness

This area has retained its primeval character, affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable. A few firebreaks along the ridge tops are present as a result of the 1973 Finley Creek fire. The firebreaks were seeded with nonindigenous species and planted with native trees. Two developed campgrounds exist along the eastern boundary off Chemise Mountain Road. Trails have been constructed from the campgrounds to the top of Chemise Mountain, part way down to the ocean, and south to Sinkyone State Park. Two short ways enter the area in the north and one near Whale Gulch.

Opportunities for Solitude

Topographical and vegetation diversity provide outstanding opportunities for solitude. Views of the Pacific Ocean and to the south into the Sinkyone Wilderness State Park enhance opportunities to experience both solitude and spaciousness.

Opportunities for Primitive and Unconfined Recreation

Opportunities for primitive and unconfined types of recreation exist in the WSA, however, they are not outstanding due to the rugged terrain and dense vegetation which restrict movement and the ability to get away from other users. Examples of the types of recreation are: hiking, backpacking, camping, horseback riding, photography, bird watching, and sightseeing.

Photo 3-3. View of Shelter Cove from Chemise Mountain, elevation 2,598 feet.

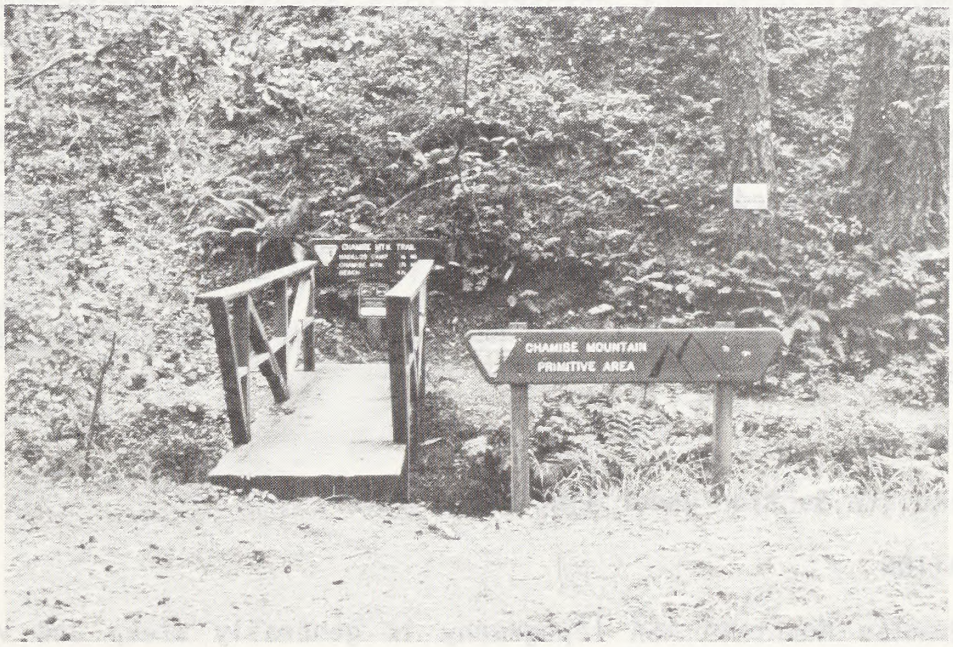


Photo 3-4. Trail entering the Chemise Mountain WSA. The primitive area, the boundaries of which are the same as those of the WSA, was established in 1975.

Special Features

The special feature of the Chemise Mountain WSA is the unique visual qualities present. Important visual aspects of the WSA include ocean vistas and natural vegetation (see Photos 3-3 and 3-4).

LAND OWNERSHIP

Except for about 20 acres of private land on the northern tip of the WSA, the entire WSA is public land (Map 2-4).

TIMBER RESOURCES

Chemise Mountain has approximately 700 acres of commercial forest land capable of a sustained yield of timber and a nominal standing volume of 500 MMbf.

VEGETATION

Chemise Mountain WSA shares many similarities with the King Range WSA immediately to the north. The mixed evergreen forest is the dominant plant community (approximately 2,500 acres). Douglas-fir (*Pseudotsuga menziesii*) is the primary overstory species within the drainages and on the more mesic sites. Hardwoods (e.g., tan oak, *Lithocarpus densiflora* and madrone, *Arbutus menziesii*) begin dominating the overstory with increasingly drier soil moisture regimes. As sites become xeric, the hardwoods of the mixed evergreen forest become scrubby, and the community transcends into manzanita/ceanothus chaparral with manzanita (*Arctostaphylos* spp.) and ceanothus (*Ceanothus* spp.) representing the climax situation. This chaparral community dominates the central portion of the WSA.

Northern coastal scrub occurs to a limited extent near the immediate coast. Coastal prairies occur as small isolated islands. The grasslands are composed of introduced perennials (e.g., velvet grass, *Holcus lanatus*), introduced annuals (e.g., dogtail, *Cynosurus echinatus*) and native perennials (e.g., blue wildrye, *Elymus glancus*).

Botanical values are limited to habitat for leafy reedgrass, *Calamagrostis foliosa*, along the coastal bluffs.

WILDLIFE

See Wildlife Section under King Range WSA.

RECREATION

The Chemise Mountain WSA topography is generally steep and very rugged. The 5-mile-long Chemise Mountain Trail is accessed from the BLM's Wailaki and Nadelos Campgrounds on the Chemise Mountain Road. Recreational activities are generally restricted to hiking, sightseeing, photography, nature study, and wildlife viewing. The trail, running the coastal ridge, provides a view of the Pacific Ocean and surrounding lands. Recent landslides have washed out the trail next to the beach. Beach access is limited and

that that is accessible by foot is from Shelter Cove. ORV use is prohibited within the WSA. Total nonmotorized recreation use is estimated to be 1,500 visits per year.

MINERAL AND ENERGY RESOURCES

See Mineral and Energy Resources section under King Range WSA, page 3-11.

CULTURAL RESOURCES

Past investigation in the area (Levulett, 1976) indicates the area received little use in prehistory or the evidence has been obliterated by recent use. Either hypothesis has some validity as witnessed by the limited nature and poor condition of the two known prehistoric archaeological sites (CA-HUM-254 and 255).

Historically, a portion of the area was homesteaded and logged. An abandoned orchard, numerous stumps, and noticeable surface disturbance are indications of these uses.

VISUAL RESOURCES

The unique coastline with its primeval character is rated as having high scenic quality. Portions of the study area's coastline are seen from Point Delgada at Shelter Cove in the middleground view.

The extremely steep and rugged coastline of the WSA is continuous its full length. Rising dramatically, the barren cliffs give way to chaparral and sparse Douglas-fir in the drainages on the west slope to vast stands of chaparral on the ridge. The east slope is more densely covered with stands of Douglas-fir, tan oak, and madrone. Hidden Valley, located in the northern portion of the study area, is approximately 30 acres in size and is one of the few relatively flat areas within the study area. This meadow has recently been used as a holding pen for elk transplants. In 1973, the Finley Creek fire burned much of the northern portion of the area and is still showing its effects. A few firebreaks are still visible along the ridgelines.

that that is accessible by foot is from Shelter Cove. 09% use is prohibited within the NRA. Total nonmotorized recreation use is estimated to be 1,500 visits per year.

MINERAL AND ENERGY RESOURCES

See Mineral and Energy Resources section under King Range NCA, page 3-11.

CULTURAL RESOURCES

Past investigations in the area (Lewis[illegible], 1976) indicates the area received little use in prehistory or the evidence has been obliterated by erosion. Either hypothesis has some validity as witnessed by the limited nature and poor condition of the two known prehistoric archaeological sites (CA-HUM-254 and 255).

Historically, a portion of the area was homesteaded and logged. An abandoned orchard, numerous stumps, and multiple surface disturbance are indicators of these uses.

VISUAL RESOURCES

The outlook coalesces with its primeval character to date as lacking high scenic quality. [illegible] of the [illegible] area's landscape are [illegible] point helipad or shelter close to the [illegible] view.

The extremely steep and rugged coastline of the NCA is continuous its full length. Working [illegible]. The ocean will [illegible] spectacular Douglas-fir in the [illegible] on the west slope to [illegible] chaparral on the ridge. The coast slope is more densely [illegible] stands of Douglas-fir, [illegible], and madrone. Mixed valleys, located in the northern portion of the [illegible], is supplemented [illegible] and is one of the relatively [illegible] within the [illegible]. This meadow was recently used as a holding [illegible] for elk transplants. In 1973, the Finley Creek fire burned [illegible] the northern portion of the area and is still showing its effects. A few firebreaks are still visible along the ridgelines.

Chapter 4

Environmental Consequences

CHAPTER 4

ENVIRONMENTAL CONSEQUENCES

This chapter focuses directly on the issues identified in Chapter 1. For each WSA the environmental impacts of the management actions included in the Proposed Action and each alternative are described issue by issue. The environmental impacts of these alternatives on the areas' other resources have also been analyzed and have been found to be insignificant. To understand this analysis the management actions of each Proposed Action and alternative must be understood (see Chapter 2).

There are no separate headings in this chapter for mitigating measures or cumulative impacts. All potential mitigating measures have been incorporated in the Proposed Actions and alternatives; no new measures were developed during the analysis. Cumulative impacts have been specifically discussed by the interdisciplinary team and, where appropriate, incorporated into the analysis below.

Because of the general nature of this analysis and the lack of numerical and statistical information regarding the areas' resources, impacts in this chapter are often expressed in relative terms. For the purpose of this analysis the meanings of these terms are as follows:

- Negligible impact - the degree of anticipated environmental impact is considered less than minor.

- Minor impact - comparatively unimportant; in terms of the area's wildlife resources, a minor impact is one affecting a specific group of individuals of a population in a localized area for one generation or less; the integrity of the regional population is not likely to be affected.

- Moderate impact - an effect sufficient enough to cause a change in the abundance of a resource or its distribution. In terms of the area's wildlife, the abundance or distribution of a portion of the regional or local population would change over more than one generation, but would not affect the integrity of the regional population as a whole.

- Major impact - an effect sufficient enough to cause a decline in the abundance of a resource or a change in distribution of a resource. In terms of the area's wildlife, the abundance or distribution of the regional or local population of a species would decline beyond which natural recruitment would not likely return that population to its former level within several generations.

KING RANGE WSA
(CA-050-112)

PROPOSED ACTION (PARTIAL WILDERNESS)

Under the Proposed Action 20,620 acres of public land in the King Range WSA are recommended for wilderness. Areas in the extreme northwestern, north central and southern portion of the WSA totaling 12,280 acres are not recommended for wilderness, but will be managed in accordance with the existing King Range Management Program (1974).

The primary impacts under this proposal relate to wilderness values and the preservation of archaeological resources.

Impacts on Wilderness Values

Wilderness values on 20,620 acres of the WSA will be protected by legislative mandate while 12,280 acres will not receive the special legislative protection provided by wilderness designation. Wilderness values will, for the most part, be retained as a result of limiting motorized vehicle use to 13 miles of designated routes of travel, eliminating motorized vehicle use altogether (with the exception of 3 miles of the King Range Road) nearly half of every year (from November 1 through March 31), and imposing certain restrictions on timber harvesting, and designating the Honeydew Wildlife Preserve an Area of Critical Environmental Concern (ACEC).

- Naturalness

  There will be an adverse impact to naturalness on nearly 100 acres of land on or immediately adjacent to the 13 miles of road which will remain open under the Proposed Action and 1.5-acre staging area proposed for development along the Smith-Etter Road. These impacts will be due primarily to the noise and visual intrusions and erosion associated with the existing and projected levels of motorized vehicular use (from 1,800 visitor days annually, to 2,150 visitor days) and road maintenance (Management Actions 20 and 22-25), and recreation improvements (Management Action 30). Conversely, natural values will be enhanced on approximately 20 acres of land as a result of closing 3 miles of Spanish Ridge Road and 4 miles of Saddle Mountain Road all of which are within the area recommended suitable.

  Surface disturbance associated with timber harvesting (logging, road building, etc.) will have a moderate very localized, negative impact on the natural characteristics of approximately 240 acres every 10 years for the next 100 years outside of the area recommended suitable. The net long-term effect of these actions on the whole of the WSA's natural characteristics will, however, be minor due to the interval between logging operations, the location of these operations, reforestation, and the imposition of mitigating measures designed to lessen the visual and environmental impact of these operations (Management Actions 5-8).

More localized impacts to naturalness will result from excavation of portions of the Mattole River estuary, the construction of seven helispots (four or five within the suitably recommended portion of the WSA), and the construction or improvement of 11.75 miles of fences (Management Actions 15, 18, and 31). Two miles of this fence are within the suitably recommended portion of the WSA. The excavation of the Mattole will affect the perception of naturalness on not more than 10 acres outside the suitably recommended portion of the WSA, primarily during the excavation process itself. The soil that will be excavated and placed on shore will be revegetated and essentially unnoticeable within 2 years. The helispots will be located so that they will have minimal visual impact. It is estimated that they will result in a permanent off-site negative impact on naturalness on less than 20 acres. This is exclusive of the impact of the presence of helicopters which will only occur when there was a fire or other emergency. The fences will reduce naturalness on about 30 acres, the major portion of the impact coming from the contrast in grazing intensity in different pastures.

Precluding full fire suppression with mechanized equipment (except to prevent loss of human life or to protect private or higher value property) on the 20,620 acres recommended for wilderness and the surface disturbance associated with this activity will have a minor, positive impact on the area's naturalness. Prescribed burns on 80 acres per year on ridgetops and midslopes on the west side of the WSA will have a minor, short-term negative impact on the perception of naturalness, but will benefit these perceptions in the long-term, enhancing the area's fire-dependent ecosystem. These burns will be limited to 10- to 15-acre patches to minimize any adverse impact. Field inventories will be conducted to mitigate any potential impact to sensitive plants or their habitat. In addition to these long-term benefiting actions, naturalness will slightly benefit from perennial grass seedings on 15 acres of land each year over the next 10 years (Management Actions 4 and 27) and livestock fencing along 1.2 miles of the Mattole River estuary (Management Action 32).

- Solitude

Opportunities for solitude will be adversely impacted on nearly 2,500 acres of land proximate to the 13 miles of road which will remain open, due primarily to the noise and visual intrusions associated with motorized vehicle use along these roads.

In addition, surface disturbances and noise associated with timber harvests on 240 acres of the nonsuitable portion of the WSA approximately every 10 years will have an adverse impact on 750 to 1,000 acres each decade. The cumulative effects of these harvests, however, will be minor due to the interval between logging operations, reforestation efforts, and the imposition of mitigating measures designed to lessen the visual and environmental impact of these operations. The opportunities for solitude will be negligibly impacted as a result of prescribed burns on 80 acres of the WSA per year.

Conversely, these opportunities will be enhanced on approximately 20 acres of land as a result of closing 7 miles of road within the study area. Nonmotorized recreational use is also expected to increase slightly (from 5,300 visitor days annually to 6,000 visitor days) but will have a negligible adverse impact on solitude along the area's trails and beaches.

- Primitive or Unconfined Recreation

Opportunities for primitive or unconfined recreation will be moderately enhanced by the management actions that improve access and enhance recreational use. These actions include the maintenance and/or construction of 15 miles of hiking trails (Management Actions 25 and 27), and the 13 miles of roads that will be open and maintained for at least 7 months each year (Management Actions 20 through 25), and the 1.5-acre staging area proposed for development along the Smith-Etter Road (Management Action 30). Although these actions will make it more difficult for backpackers and others who come into the area without using vehicles to enjoy primitive or unconfined recreation, the disturbed areas will be relatively easy to avoid and because of the access, more people will be able to find remote sites.

Although areas immediately adjacent to these roads and improvements where vehicles are allowed will not be suitable for primitive or unconfined recreation, the intrusions (the access ways and staging area) make it much easier for people to get to areas where they can have such unconfined recreation, for example, on remote stretches of the beach.

- Special Features

The special features of the King Range WSA include its unique geology, outstanding scenic qualities, and cultural resources. The geology of the area will not be impacted by the management actions under the Proposed Action. The area's scenic qualities will, however, receive minor, negative impacts as a result of the timber harvests to be conducted on 210 acres of the nonsuitable portion of the WSA every decade for the next 100 years and the prescribed burns on 80 acres every year over the next 10 years. The area affected by the burns and timber harvests will extend well beyond the area directly impacted (an average of about 100 acres per year). There will be visual impacts on about 400 acres per year on lands in addition to those actually affected. Smoke from prescribed burns will visually affect up to one-fifth of the study area for short periods of time (1-3 days at most per year). Visual resources will also be impacted by all of the management actions that will impact naturalness as on page 4-3.

Archaeological resources along the area's marine terraces will sustain minor negative impacts as a result of greater beach access and increased surface disturbance, theft, and vandalism caused by increased visitor use. These impacts will be lessened through photo-monitoring and increased patrols of known sites.

Conclusion

The management actions under the Proposed Action for both the wilderness and nonwilderness portions of the WSA will have a moderate adverse impact on the area's wilderness values. Naturalness and solitude will be negatively impacted as a result of existing and projected vehicle use along 13 miles of road that will remain open and the surface disturbance and noise associated with logging 240 acres every 10 years over the next 100 years. Naturalness characteristics will be lost on approximately 300 acres outside the suitably recommended portion of the WSA, over the next 10 years and an additional 240 acres every 10 years for the following 90 years. The cumulative effect of the logging operations will be minor due to the interval between these operations, reforestation, and logging restrictions. The perception of solitude will be impaired on 3,250 to 3,500 acres during the first decade and 750 to 1,000 acres each subsequent decade until the year 2090. These activities will have a minor, localized effect on the area's visual resources and a minor impact on the cultural resources found along the WSA's marine terraces.

Impacts on Motorized Recreational Use Levels

Under the Proposed Action, over 65 percent of the area's existing routes of travel will remain open to motorized vehicular use, increasing motorized recreational use from 1,800 visitor days per year to 2,150 visitor days. Most of this increase (250 visitor days) will occur on the Smith-Etter Road which will be open 7 months of the year (April 1 through October 31) to within one-third mile of the beach (Management Action 20, page 2-5). A parking area will be located here and substantial barriers will be constructed to restrict vehicles from the beach. The remaining 100 visitor days of increased use will occur along Telegraph Ridge Road and the King Range Road. Seven miles of road will be closed eliminating less than 50 visitor days of motorized use estimated to occur along these routes each year.

In addition, those roads remaining open will be maintained annually by the Bureau.

Conclusion

Motorized recreation opportunities will be slightly enhanced on 13 miles of road within the WSA as a result of keeping these roads open, maintaining them annually, and constructing a parking area at the Smith-Etter Road terminus one-third mile from the beach and staging area mid-way along the Smith-Etter Road.

Impacts on Livestock Grazing Management

Livestock operators using the Spanish Ridge Road and last one-third mile of the Smith-Etter Road will have to use horses or other nonmotorized methods for some of their maintenance work (Management Actions 19 and 20). This will have a minor negative impact on grazing operations. Road maintenance by BLM (Management Actions 20, and 21, pages 2-5 and 2-6) will facilitate use of the roads by livestock operators. Prescribed burning of 80 acres per year (Management Action 1, page 2-1) could provide additional

forage for livestock, but most of the burns will be in areas where there are no cattle. Broadcast seeding in the northern part of the WSA (Management Action 4, page 2-1) could also provide minor benefits to cattle as will the construction of water boxes on Big Flat (Management Action 11, page 2-2).

Conclusion

Road closures and vehicle use restrictions along the Smith-Etter Road and Spanish Ridge Road will have a minor negative impact on livestock grazing management.

Impacts on Timber Management

Under the Proposed Action 35 MMbf of timber on 2,125 acres of commercial forest land (CFL) will be lost (unavailable for harvest) because it occurs in the area recommended suitable for wilderness designation. This timber will be worth about $2.5 million on-the-stump at today's prices.

Timber production will receive minor benefits from timber stand improvement work on 100 acres per year (Management Action 8, page 2-2) and from the fire protection afforded by Management Actions 17 and 18, page 2-5.

Conclusion

The loss of over 2,125 acres of CFL and 35 MMbf will have a minor adverse impact on the area's timber management program and negligible impact on the region's economy.

Impacts on the Reintroduction and Management of Roosevelt Elk

Wilderness designation of 20,620 acres of the King Range WSA will have a minor, positive impact on the reintroduction of the Roosevelt elk. Vehicular access will be restricted to 13 miles of designated routes of travel and logging operations on nearly 5,000 acres within the suitable portion of the WSA will be precluded. Visitor use will increase slightly as a result of designation and continued vehicular access along routes within the suitable and nonsuitable portions of the WSA but will remain below 8,130 visitor days of motorized and nonmotorized use annually. This will lead to minor increases in the disturbance of the elk but the impacts will be negligible. Periodic timber harvests on 2,125 acres outside the area proposed for wilderness (Management Action 5, page 2-2) and annual timber stand improvement (Management Action 8, page 2-2) will have a short-term, minor negative impact, but will benefit elk in the long-run by providing increased forage during early successional stages.

The new elk enclosure, prescribed burns, and spring developments (Management Actions 1, 10, and 11, pages 2-1 and 2-2) to be implemented under this proposal will have a moderate beneficial impact on reintroduction efforts. These actions and subsequent monitoring of the herd will be conducted using motorized vehicles as specified in the Bureau's Wilderness Management Policy.

Consequences

Approximately 11,600 acres of the WSA will continue to be utilized indefinitely for livestock grazing. Under the Proposed Action, the area will be managed at the present level of 3,000 animal unit months (AUMs) which will have a negligible impact on the reintroduction of Roosevelt elk.

Conclusion

Efforts to reintroduce the Roosevelt elk will be slightly enhanced by the continued closure of the area to motorized vehicle use except on designated routes of travel. Motorized recreational use of the WSA will not increase significantly and will, therefore, have a negligible impact on reintroduction efforts. Motorized vehicles will be used in elk transplants and herd maintenance; an elk enclosure and water sources will be developed and prescribed burns will be conducted on 80 acres of land each year over the next decade further enhancing these efforts.

Impacts on Salmon and Steelhead Spawning and Nursery Streams

Management Actions 12, 13, 14, and 15 (pages 2-2 and 2-5) are designed specifically to benefit salmon and steelhead spawning and nursery streams and will result in moderate benefits to the habitat of these species particularly in the Mattole River estuary. Many of the other management actions will affect these streams through their impact on soil erosion rates. Some of them will increase erosion, others will cause it to decrease, but the net impact will be negligible. Management actions leading to increased siltation in these streams include prescribed burning (Management Action 1, page 2-1), timber harvesting (Management Action 5, page 2-2), timber stand improvement (Management Action 8, page 2-2), increased vehicle use of existing roads (Management Actions 20, 22, and 25, pages 2-5 and 2-6), construction of a 3-mile hiking trail (Management Action 29, page 2-7). Management actions reducing siltation in these streams include limiting the size of individual prescribed burns (Management Action 3, page 2-1), broadcast seeding of native grasses in the northern part of the WSA (Management Action 4, page 2-1), the mitigation measures associated with the timber management actions (Management Actions 6 and 9 and part of Management Action 5, page 2-2), the establishment of riparian vegetation along the Mattole River estuary (Management Action 13, page 2-5), proper maintenance of access roads (Management Actions 23 and 24, page 2-6, and the last sentence of Management Action 17, page 2-5), and fencing that will keep livestock out of riparian vegetation (Management Action 32, page 2-8).

Conclusion

Salmon and steelhead habitat in the Mattole River estuary will receive moderate positive impacts from various habitat improvements that will be constructed in and near the river. Streams throughout the WSA will receive a minor increase in siltation from such management actions as prescribed burning, timber harvesting, and increased vehicle use. This increase in siltation will be roughly counterbalanced by decreases in siltation from mitigation measures for prescribed burning and timber harvesting, road maintenance, and the establishment of riparian vegetation. Based on these actions, no change in population levels of salmon or steelhead is projected.

Impacts on the Preservation of Archaeological Resources

In addition to natural weathering, the two main threats to archaeological resources are destruction from indiscriminate vehicular use and theft or vandalism. Under the Proposed Action, motorized vehicles will be restricted to designated routes of travel (Management Action 38, page 2-9) thereby eliminating indiscriminate vehicular use. The Smith-Etter Road will, however, remain open 7 months of the year to within one-third mile of the beach (Management Action 20, page 2-5), allowing greater beach access. Motorized recreational use along this road will increase from 750 visitor days annually to 1,000 visitor days. Nonmotorized recreation use along the beach is also expected to increase from 3,200 visitor days annually to nearly 3,600 visitor days. These increases will have a minor negative impact on the area's cultural resources as a result of surface disturbance, theft, and vandalism associated with increased visitor use. To this end, 45 photo-monitoring stations will be established by 1991 and examined semiannually to monitor the effect of this use and known sites will be patrolled by Bureau employees at a minimum of once a month mitigating these impacts.

Conclusion

There will be a minor negative impact to the area's archaeological resources as a result of increased pedestrian use.

Adverse Impacts Which Cannot be Avoided

Despite the application of mitigating measures to timber management and recreational management activities, some minor adverse environmental effects cannot be avoided. These include slight, short-term increases in sediment yield to streams from logging operations, temporary loss of the perception of naturalness and solitude along the roads designated "open" for motorized recreational use, and higher potential for the destruction of several archaeological sites as a result of greater beach access and pedestrian use.

Relationship Between Local Short-Term Uses of Man's Environment and the Maintenance and Enhancement of Long-Term Productivity

The Proposed Action is an attempt to strike a good balance between local short-term uses of man's environment (for example, timber harvesting) and the maintenance and enhancement of long-term productivity. About one-third of the WSA (12,280 acres) will remain open for timber harvest and mineral entry. The remainder will be protected from such activities under wilderness designation. In either case, long-term productivity will be maintained because no mineral development is anticipated, and no activities that will measurably reduce long-term productivity will be permitted.

Irreversible and Irretrievable Commitments of Resources

The only irreversible and/or irretrievable commitment of resources will be the loss of any of the area's important archaeological sites through increased pedestrian use and the surface disturbance associated with this use and increased vandalism or theft.

Consequences

ALL WILDERNESS ALTERNATIVE

Under this alternative, the entire 32,900 acres of the King Range WSA would be recommended as suitable for wilderness designation.

The primary impacts under this alternative relate to wilderness values and archaeological resources.

Impacts on Wilderness Values

Under the All Wilderness Alternative, all 33,635 acres (32,900 from the WSA plus 735 acres between Honeydew Creek and Bearwallow Ridge outside the WSA) of the King Range WSA would be recommended suitable for wilderness designation and all the values would be protected by legislative mandate. Wilderness values of naturalness, solitude, primitive or unconfined recreation and the area's special features (the geology, outstanding scenic values, and important archaeological resources) would be retained.

- Naturalness

  There would be a moderate, beneficial impact on naturalness to roughly 10 percent of the WSA as a result of closing the area's roads to motorized recreational use, and eliminating 1,780 visitor days annually and the noise and visual intrusions associated with this use. These roads would no longer be maintained by the Bureau but would be maintained to the same standards of quality and size by private inholders and grazing lessees who would continue to be provided access under this alternative. This maintenance would adversely impact naturalness on 100 acres of land adjacent to these roads. Logging would also be precluded on 6,985 acres, eliminating any soil erosion that would occur if these lands were logged and retaining the characteristics of naturalness on these lands.

  Like the Proposed Action the restriction of full fire suppression with mechanized equipment (except to provide clear passage on existing roads) throughout the WSA and the surface disturbance associated with this activity would have a minor positive impact on the area's naturalness. Prescribed burns on 80 acres per year on ridgetops and midslopes on the west side of the WSA would have minor, short-term negative impacts on the perception of naturalness, but would benefit these perceptions in the long-term, enhancing the area's fire-dependent ecosystem. These burns would be limited to 10- to 15-acre patches and immediately reseeded to minimize soil erosion and any other adverse impact. Field inventories would be conducted to mitigate any potential impact to sensitive plants or their habitat. In addition to these long-term benefiting actions, naturalness would slightly benefit from perennial grass seedings on 15 acres of lands each year over the next 10 years (Management Action 11, page 2-10), and recovery of vegetation from fencing 1.2 miles along the Mattole River estuary (Management Action 12, page 2-10).

  Wilderness designation would withdraw the WSA from all forms of appropriation under the mining and mineral leasing laws thereby further protecting the area's naturalness.

- Solitude

Impacts on solitude would basically be the same as those described for naturalness. The closure of the area to motorized recreational use would have a moderate beneficial impact on approximately 7 to 8 percent of the WSA on lands proximate to existing routes of travel. Logging operations would also be precluded which would moderately enhance solitude. Nonmotorized recreation use is expected to increase slightly (from 5,300 visitor days to nearly 6,000 visitor days annually) but would have a negative adverse impact on solitude along the area's trails and beaches.

- Primitive or Unconfined Recreation

The opportunities for primitive or unconfined recreation would be slightly diminished by restricting motorized access along the 20 miles of existing routes within the WSA. These routes would, however, remain open to nonmotorized recreation use. For those users hiking these routes, the elimination of motorized vehicles would enhance the quality of primitive or unconfined recreation. In addition, the maintenance of 15 miles of trail (Management Action 11, page 2-10) and construction of 3 miles of trail from the end of the King Range Road to Bear Trap Ranch (Management Action 11) would enhance these values, as would the elimination of timber harvests on 4,555 acres in the northeastern quarter of the WSA.

- Special Features

As in the Proposed Action, the area's geology would not be impacted by the management actions under the All Wilderness Alternative. The closing of the area to motorized recreational use would have a minor benefiting impact on the area's archaeological resources; beach access would be diminished and pedestrian use would decrease. The area's scenic qualities would also benefit under this alternative as timber harvests would be eliminated on roughly 20 percent of the WSA.

Conclusion

Under the All Wilderness Alternative, there would be a moderate benefit to the area's wilderness values as a result of restricting motorized recreational use on 20 miles of road and eliminating timber harvests on 6,985 acres in the northeastern quarter of the WSA.

Impacts on Motorized Recreational Use Levels

There would be no vehicular use on the roads penetrating the WSA except for normal access for the owners of inholdings, emergency use, and livestock operations that cannot reasonably be done using horses (see Management Actions 6 through 10 for the All Wilderness Alternative, page 2-10). This would mean a loss of 1,500 visitor days of motorized recreational use per year. In addition, the current 300 visitor use days (VUDs) per year of motorized recreational use on the beach between just south of Kaluna Cliff and Gitchell Creek would be eliminated.

Consequences

Conclusion

The area would be closed to motorized vehicles eliminating 1,780 visitor days of motorized recreational use. This would have a moderate adverse impact on motorized recreational opportunities due to the limited amount of opportunity on public lands surrounding the WSA.

Impacts on Livestock Grazing Management

The impacts on livestock grazing management under the All Wilderness Alternative would be the same as those described for the Proposed Action on page 4-5.

Conclusion

Road closures and vehicle use restrictions along the Smith-Etter Road would have a minor, negative impact on livestock grazing management.

Impacts on Timber Management

No timber would be harvested and there would be no timber stand improvement within either the WSA or the 735-acre old-growth expansion area. This would mean an eventual loss of 54.7 MMbf on 4,555 acres of commercial forest land. This timber is worth about $4.1 million on-the-stump at today's prices. Also lost would be 300 cords of firewood per year that otherwise would be produced from the timber stand improvement projects. This cordwood is worth about $3,000.

Conclusion

Under this alternative, 54.7 MMbf of merchantable timber on 4,555 acres of commercial forest land would be foregone. This would have a negligible, short-term adverse impact on the region's economy.

Impacts on the Reintroduction and Management of Roosevelt Elk

The impacts to the reintroduction and management of Roosevelt elk would be the same as those described for the Proposed Action (Partial Wilderness) except that motorized vehicles would be prohibited, eliminating 1,780 visitor days of motorized recreational use. Aside from reducing the noise and visual intrusions associated with this use, potential human disturbance to the elk would also be reduced. Timber harvests would be eliminated, reducing noise and surface disturbance on 4,555 acres and benefiting reintroduction efforts in the short-term. These reintroduction efforts would be negligibly impaired over the long-term because of the loss in forage from the timber harvests and timber stand improvements (Management Actions 2 and 3, page 2-9).

The new elk enclosure, spring development, etc. (Management Action 4, page 2-9) to be implemented under this proposal would have a moderate beneficial impact on reintroduction efforts. These actions could be conducted using motorized vehicles as specified in the Bureau's Wilderness Management Policy if no other practical alternative exists.

Conclusion

Efforts to reintroduce the Roosevelt elk would be slightly enhanced by the closure of the area to motorized vehicle use. Timber harvests would be eliminated benefiting reintroduction efforts in the short-term, but negligibly impairing these efforts over the long run.

Impacts on Salmon and Steelhead Spawning and Nursery Streams

Motorized vehicular use in the King Range WSA would be restricted eliminating 1,780 visitor days of motorized recreational use and the surface disturbance associated with this use. As a result sedimentation levels would diminish slightly, benefiting salmon and steelhead spawning and nursery streams. Timber harvests on 6,985 acres would also be precluded eliminating any increase in sedimentation levels. In addition, management actions designed specifically to benefit salmon and steelhead spawning and nursery streams would be implemented under the alternative. These include dismantling three stream barriers every other year to allow fish passage, providing summer rearing habitat. Eighty acres of prescribed burns would be conducted each year for the next decade, but these burns would be limited to 10- to 15-acre patches in order to minimize the possibility of erosion.

Conclusion

Overall, there would be a moderate, positive impact to salmon and steelhead spawning and nursery streams as a result of various habitat improvements that would be constructed in and near the streams. The quality of these streams would be enhanced as a result of vehicle closures and the elimination of timber harvests.

Impacts on the Preservation of Archaeological Resources

Under the All Wilderness Alternative, vehicle access to the coastal portions of the WSA would be greatly reduced. The beach from just south of Kaluna Cliff to Gitchell Creek would be closed to vehicle use as would the Smith-Etter Road at the point where it enters the WSA, 5 miles from the beach. These and other road closures would eliminate 1,800 visitor days of motorized use and would enhance the preservation of the area's archaeological resources. Nonmotorized recreation use along the beach, however, would increase from 3,200 visitor days per year, to 3,600 and have a minor adverse impact on the area's cultural resources as a result of the surface disturbance associated with increased pedestrian use and increased theft and vandalism. To this end, 45 photo-monitoring stations would be established in 1991 and examined semiannually to monitor the effect of this use. Known sites would be patrolled by Bureau employees at a minimum of once a month to mitigate these impacts.

Conclusion

There would be a minor positive impact to the area's archaeological resources as a result of eliminating motorized access and increasing monitoring.

Consequences

NO WILDERNESS/NO ACTION ALTERNATIVE

Under this alternative, none of the entire 32,900 acres of the King Range WSA would be designated wilderness.

The primary impacts under this alternative relate to wilderness values and archaeological resources.

Impacts on Wilderness Values

None of the WSA would be recommended as suitable for wilderness designation and none of the wilderness values on 32,900 acres would receive the special legislative protection provided by wilderness designation. Wilderness values would, for the most part, be retained as a result of limiting motorized vehicle use to 16 miles of designated routes of travel, eliminating motorized vehicle use altogether nearly half of every year, and imposing certain restrictions on timber harvesting.

- Naturalness

As in the Proposed Action, pages 4-2 and 4-3, the use of 16 miles of road (including Spanish Ridge Road, Management Action 8, page 2-13), increases in motorized vehicle use (from 1,780 visitor days annually to 2,130 visitor days), and recreation improvements (Management Action 10, page 2-14) would have an adverse impact on naturalness on nearly 125 acres of land on or immediately adjacent to these roads. These impacts would be due primarily to the noise and visitor intrusions associated with motorized vehicular use, and road maintenance. Closure of 3 miles of the Saddle Mountain Road would allow 10 to 15 acres of disturbed area to naturally rehabilitate, thereby enhancing the appearance of naturalness.

Surface disturbance and soil erosion associated with timber harvesting would have a localized, negative impact on the natural characteristics of approximately 700 acres every 10 years over the next century. As in the Proposed Action, however, the net long-term effect of these actions on the whole of the WSA's natural characteristics would be minor due to the interval between logging operations, the location of these operations, reforestation, and the imposition of mitigating measures designed to lessen the visual and environmental impact of these operations (Management Action 2, page 2-13) such as those resulting from soil erosion.

Prescribed burns on 80 acres per year on ridgetops and midslopes on the west side of the WSA would have minor, short-term negative impacts on the perception of naturalness but would benefit these perceptions in the long term, enhancing the area's fire-dependent ecosystem. These burns would be limited to 10- to 15-acre patches to minimize any adverse impact. Field inventories would be conducted to mitigate any erosion and potential impact to sensitive plants or their habitat. In addition to these long-term benefiting actions, naturalness would slightly benefit from perennial grass seedings on 15 acres of lands each year over the next 10 years (Management Action 1, page 2-13) and livestock fencing along 1.2 miles of the Mattole River estuary (Management Action 11, page 2-14).

- Solitude

Opportunities for solitude would be adversely impacted on nearly 3,000 acres of land proximate to the 16 miles of road which would remain open and the 1.5-acre staging area proposed for development along the Smith-Etter Road, due primarily to the noise and visual intrusions associated with motorized vehicle use along these roads. In addition, surface disturbance and noise associated with timber harvests on 700 acres of the nonsuitable portion of the WSA approximately every 10 years would have an adverse impact on 1,500 to 2,000 acres each decade. The cumulative effects of these harvests, however, would be minor due to the interval between logging operations, reforestation efforts, and the imposition of mitigating measures designed to lessen the visual and environmental impact of these operations. The opportunities for solitude would be negligibly impacted as a result of prescribed burns on 80 acres of the WSA per year.

Conversely, these opportunities would be retained on approximately 10 to 15 acres of land as a result of closing 4 miles of road. Nonmotorized recreational use is also expected to increase slightly (from 5,300 visitor days annually to 6,000 visitor days) but would have a negligible adverse impact on solitude along the area's trails and beaches.

More localized impacts to naturalness would result from excavation of portions of the Mattole River estuary, the construction of seven helispots, and the construction or improvement of 11.75 miles of fences (Management Actions 15, 18, and 31). The excavation of the Mattole would affect the perception of naturalness on not more than 10 acres, primarily during the excavation process itself.

The soil that would be excavated and placed on shore would be revegetated and essentially unnoticeable within 2 years. The helispots would be located so that they would have minimal visual impact. It is estimated that they would result in a permanent off-site negative impact on naturalness on less than 20 acres. This is exclusive of the impact of the presence of helicopters which would only occur when there was a fire or other emergency. The fences would reduce naturalness on about 30 acres, the major portion of the impact coming from the contrast in grazing intensity in different pastures.

- Primitive or Unconfined Recreation

Opportunities for primitive or unconfined recreation would be slightly enhanced by management actions that improve access and enhance recreational use. These include the maintenance and/or construction of 15 miles of hiking trails (Management Action 9, page 2-14) the 16 miles of road that would be open and maintained for at least 7 months each year, and beach openings from just south of Kaluna Cliff to Gitchell Creek. Although areas immediately adjacent to these roads where vehicles are allowed would not be suitable for primitive or unconfined recreation, the intrusions (the access ways and recreational improvements) make it much easier for people to get to areas where they can have such unconfined recreation.

Consequences

- Special Features

The impacts to the area's special features under the No Wilderness/No Action Alternative would be similar to those described under the Proposed Action on page 4-4. The geology of the area would not be impacted by the management actions under the Proposed Action. The area's scenic qualities would, however, receive moderate, negative impacts as a result of the timber harvests to be conducted on 700 acres of the WSA every decade for the next 100 years and the prescribed burns on 80 acres every year over the next 10 years. These impacts would, however, be highly localized.

Archaeological resources along the area's marine terraces would sustain minor negative impacts as a result of greater beach access and increased pedestrian use and the surface disturbance associated with this use and greater incidence of theft and vandalism. These impacts would be lessened through photo-monitoring and increased patrols of known sites.

Conclusion

The management actions under the No Wilderness/No Action Alternative would have a moderate adverse impact on the area's wilderness values. Naturalness and solitude would be negatively impacted as a result of existing and projected vehicle use along 16 miles of road that would remain open and the 1.5-acre staging area proposed for development along the Smith-Etter Road and the surface disturbance and noise associated with logging 700 acres every 10 years over the next 100 years. Naturalness characteristics would be lost on approximately 900 acres over the next 10 years and an additional 700 acres every 10 years for the following 90 years. The cumulative effect of the logging operations would be minor due to the interval between these operations, reforestation, and logging restrictions. The perception of solitude would be impaired on 4,500 to 5,000 acres during the first decade and 1,500 to 2,000 acres each subsequent decade until the year 2090. These activities would have a minor, localized effect on the area's visual resources and a minor impact on the cultural resources found along the WSA's marine terraces.

Impacts on Motorized Recreational Use Levels

The impacts on motorized recreational use levels would be the same as those described for the Proposed Action on page 4-5. Only 4 miles of road would be closed eliminating less than 25 visitor days of motorized use estimated to occur along these routes each year.

Conclusion

Motorized recreation opportunities would be slightly enhanced on 16 miles of road within the WSA as a result of keeping these roads open, maintaining them annually, and constructing a parking area at the Smith-Etter terminus and a 1.5-acre staging area along the Smith-Etter Road.

Impacts on Livestock Grazing Management

The impacts on livestock grazing management would be the same as those described for the Proposed Action on page 4-5.

Conclusion

Road closures and vehicle use restrictions along the Smith-Etter Road would have a minor, negative impact on livestock grazing management.

Impacts on Timber Management

Under the No Wilderness/No Action Alternative, ten timber sales in the next 100 years involving 54.7 MMbf or 4,555 acres would be conducted in the northeastern portion of the WSA and the old-growth expansion. Timber stand improvement would also be conducted on 150 acres per year.

Conclusion

There would be a moderate benefit to the area's timber management program as a result of timber harvests on 4,555 acres and timber stand improvements on 150 acres per year.

Impacts on the Reintroduction and Management of Roosevelt Elk

Under the No Wilderness/No Action Alternative, vehicular access would be restricted to 16 miles of designated routes of travel. Motorized vehicle use would increase slightly, but would remain at levels below 2,130 visitor days annually. Nonmotorized recreational use would also increase from the current 5,300 visitor days annually, to over 6000 visitor days. These increases in visitor use would lead to increases in disturbance to the elk, but the impacts would be negligible. Periodic timber harvests on 4,555 acres in the northeastern portion of the WSA and annual timber stand improvement in 160 acres of land would have a short-term, minor, negative impact, but would benefit the elk in the long run by providing increased forage during early successional stages.

The new elk enclosure, prescribed burns, and spring developments described in the Proposed Action on page 2-2 would have a moderate beneficial impact on reintroduction efforts. These actions and subsequent monitoring of the herd would be conducted using motorized vehicles as specified in the Bureau's Wilderness Management Policy.

Approximately 11,600 acres of the WSA would continue to be utilized indefinitely for livestock grazing. Under this alternative the area would be managed at the present level of 3,000 animal unit months (AUMs) which would have a negligible impact on the reintroduction of the Roosevelt elk.

Conclusion

Efforts to reintroduce the Roosevelt elk would be slightly enhanced by the continued closure of the area to motorized vehicle use on designated routes of travel. Motorized recreational use of the WSA would not increase

Consequences

significantly and would, therefore, have no impact on reintroduction efforts. Motorized vehicles would be used in elk transplants and herd maintenance, an elk enclosure and water sources would be developed and prescribed burns would be conducted on 80 acres of land each year over the next decade further enhancing these efforts.

Impacts on Salmon and Steelhead Spawning and Nursery Streams

The impacts would be basically the same as those described under the Proposed Action--salmon and steelhead spawning and nursery streams would moderately benefit from dismantling stream barriers, planting riparian vegetation, providing summer rearing habitat, and improving waterflow (Management Action 6, page 2-13). As a result salmon and steelhead populations would increase. Conversely, prescribed burns on 80 acres of the WSA per year, timber stand improvement on 160 acres per year, increased vehicle use and maintenance of existing roads, range and recreation improvements, and timber sales on 4,555 acres in the northeastern quarter of the WSA would increase siltation levels in spawning and nursery streams. These streams would only be negligibly impacted, however, with the imposition of timber harvest and road maintenance restrictions (Management Actions 2 and 8, respectively, page 2-13), wildlife improvement projects (Management Action 6), and management actions specifically designed to reduce siltation in these streams. These include limiting the size of prescribed burns (Management Action 7, page 2-13), and broadcast seeding of native grasses in the northern part of the WSA (Management Action 1, page 2-13).

Conclusion

Salmon and steelhead habitat in the lower Mattole River would receive moderate positive impacts from various habitat improvements that would be constructed in and near the river. Streams throughout the WSA would receive a minor increase in siltation from such management actions as prescribed burning, timber harvesting, and increased vehicle use. This increase in siltation would be counterbalanced by decreases in siltation from mitigation measures for prescribed burning and timber harvesting, road maintenance, and the establishment of riparian vegetation.

Impacts on the Preservation of Archaeological Resources

The impacts on archaeological resources would be the same as those described for the Proposed Action on page 4-8.

Conclusion

There would be a minor negative impact to the area's archaeological resources as a result of increased pedestrian use.

PARTIAL WILDERNESS ALTERNATIVE

Under the Partial Wilderness Alternative, 14,000 acres of public land in the King Range WSA would be recommended for wilderness. The remaining 18,900 acres of the WSA would not be recommended but managed in accordance with the King Range Management Program (1974).

The primary impacts under this alternative relate to wilderness values and archaeological resources.

Impacts on Wilderness Values

Wilderness values on 14,000 acres of the WSA would be protected by legislative mandate while 18,900 acres would not receive the special legislative protection provided by wilderness designation. Wilderness values, would for the most part, be retained as a result of limiting vehicle use to 13 miles of designated routes of travel, eliminating motorized vehicle use altogether nearly half of every year, and imposing certain restrictions on the 4,555 acres of timber management.

- Naturalness

  Impacts on naturalness would closely mirror those described under the No Wilderness/No Action Alternative on page 4-13. Spanish Ridge Road, however, would be closed under this alternative negligibly benefiting naturalness values. In addition, the Smith-Etter Road would extend to the marine terrace in the vicinity of the Smith and Etter cabins, further impairing naturalness characteristics.

- Solitude

  Impacts on solitude under the Partial Wilderness Alternative would be similar to those described under the No Wilderness/No Action Alternative on page 4-14. Opportunities for solitude would be adversely impacted on nearly 2,500 acres of land proximate to the 13 miles of road which would remain open and the 1.5-acre staging area proposed for development along the Smith-Etter Road. In addition, the perception of solitude would be diminished on 35 to 50 acres along the beach as a result of extending the Smith-Etter Road and opening this portion to motorized vehicle use.

- Primitive or Unconfined Recreation

  The impacts to primitive or unconfined recreation would be the same as those described under the Proposed Action on page 4-4.

- Special Features

  The impacts to the area's geology and outstanding scenic quality would be the same as those described under the No Wilderness/No Action Alternative on page 4-15.

  Archaeological resources along the area's marine terraces would sustain moderate negative impacts as a result of greater beach access and the one-third-mile extension of the Smith-Etter Road. These impacts would be lessened through photo-monitoring and increased patrols of known sites.

Conclusion

The management actions under the Partial Wilderness Alternative for both the wilderness and nonwilderness portions of the WSA would have a moderate adverse impact on the area's wilderness values. Naturalness and solitude would be negatively impacted as a result of existing and projected vehicle use along 13 miles of road that would remain open and the proposed recreation improvements and the surface disturbance and noise associated with logging 700 acres every 10 years over the next 100 years. Naturalness characteristics would be lost on approximately 900 acres over the next 10 years and an additional 700 acres every 10 years for the following 90 years. The cumulative effect of the logging operations would be minor due to the interval between these operations, reforestation, and logging restrictions. The perception of solitude would be impaired on 4,500 to 5,000 acres during the first decade and 1,500 to 2,000 acres each subsequent decade until the year 2090. These activities would have a moderate, localized effect on the area's visual resources and a minor impact on the cultural resources found along the WSA's marine terraces.

Impacts on Motorized Recreational Use Levels

Impacts on motorized recreational use levels under the Partial Wilderness Alternative would be the same as those described for the Proposed Action on page 4-5.

Conclusion

Motorized recreation opportunities would be slightly enhanced on 13 miles of road within the WSA as a result of keeping these roads open, maintaining them annually, and extending the Smith-Etter Road one-third mile to the beach.

Impacts on Livestock Grazing Management

Livestock operators along the Spanish Ridge Road would have to use horses or other nonmotorized methods for some of their maintenance work. This would have a negligible adverse impact on grazing operations. The remaining impacts to livestock grazing management under this alternative would be the same as those described for the Proposed Action on page 4-5.

Conclusion

Closure of Spanish Ridge Road would have a negligible adverse impact on livestock grazing management.

Impacts on Timber Management

The impacts on timber management under the Partial Wilderness Alternative would be the same as those described under the No Wilderness/No Action Alternative on page 4-16.

Conclusion

There would be a moderate benefit to the area's timber management program as a result of timber harvests on 4,555 acres and timber stand improvements on 150 acres per year.

Impacts on the Reintroduction and Management of Roosevelt Elk

The impacts on the reintroduction and management of the Roosevelt elk under the Partial Wilderness Alternative would be the same as those described under the No Wilderness/No Action Alternative on page 4-16.

Conclusion

Efforts to reintroduce the Roosevelt elk would be slightly enhanced by the continued closure of the area to motorized vehicular use of designated routes of travel. Motorized recreational use of the WSA would not increase significantly and would, therefore, have no impact on reintroduction efforts. Motorized vehicles would be used in elk transplants and herd maintenance, an elk enclosure and water sources would be developed and prescribed burns would be conducted on 80 acres of land each year over the next decade further enhancing these efforts.

Impacts on Salmon and Steelhead Spawning and Nursery Streams

Impacts on salmon and steelhead spawning and nursery streams under this alternative would be the same as those described under the No Wilderness/ No Action Alternative on page 4-17.

Conclusion

Salmon and steelhead habitat in the Mattole River estuary would receive moderate positive impacts from various habitat improvements that would be constructed in and near the river. Streams throughout the WSA would receive a minor increase in siltation from such management actions as prescribed burning, timber harvesting, and increased vehicle use. This increase in siltation would be counterbalanced by decreases in siltation from mitigation measures for prescribed burning and timber harvesting, road maintenance, and the establishment of riparian vegetation.

Impacts on the Preservation of Archaeological Resources

Impacts on the preservation of archaeological resources under the Partial Wilderness Alternative would be the same as described for the Proposed Action on page 4-8, except that there would be a minor increase in pressure on the archaeological sites because the Smith-Etter Road would be open all the way to the beach (Management Action 7). Although vehicles would not be permitted on the beach itself, this increased access would lead to more people getting near the culture sites and that would lead to a greater risk of damage.

Conclusion

There would be a minor negative impact to the area's archaeological resources as a result of greater beach access and increased pedestrian use.

Consequences

PROPOSED ACTION (ALL WILDERNESS)

Under the Proposed Action, the entire 4,340 acres of the Chemise Mountain WSA will be recommended as suitable for wilderness designation.

The primary impacts under this alternative relate to wilderness values and wildlife management.

Impacts on Wilderness Values

Under the Proposed Action, 4,340 acres of the Chemise Mountain WSA will be recommended suitable for wilderness designation and all wilderness values will be protected by legislative mandate. Wilderness values of naturalness, solitude, and primitive or unconfined recreation will be retained as well as the area's outstanding scenic qualities.

- Naturalness

  Of the seven management actions under the Proposed Action (see pages 2-18 and 2-21), four (Management Actions 1, 5, 6, and 7) will have minor, localized negative impacts on naturalness on 30 acres because of visual intrusions. The removal of the existing elk enclosure and rehabilitation of the disturbed lands (Management Action 3) will restore naturalness on 35 acres. Naturalness will be unaffected on 4,275 acres or 98.5 percent of the WSA.

  Prescribed burning (Management Action 1) will destroy naturalness for most viewers on 10 acres every 3 years. Natural succession will restore naturalness to most viewers within 3 years. Assuming that the burned areas were visible from an additional adjacent 5 acres, there will continuously be a loss or reduction of naturalness on 15 acres.

  The removal and rehabilitation of the elk enclosure (Management Action 3) will restore naturalness to the enclosure and adjacent lands--a total of 35 acres by 1993. Maintenance of the two helispots (Management Action 5) will maintain the disturbed condition on two separate one-half-acre areas. The completion of the trail from Chemise Mountain to Sinkyone Wilderness State Park (Management Action 6) will disrupt naturalness within a viewshed of about 10 acres and the maintenance of the Hidden Valley and Chemise Mountain Ridge Trails will intensify the disruption of naturalness on 3 acres.

- Solitude

  Impacts on opportunities for solitude will closely mirror the impacts on naturalness described above. The prescribed burning, trail construction and maintenance, the increase in nonmotorized recreation use (from 1,500 visitor days per year to 2,250 visitor days), and helispot maintenance will create or maintain localized areas where a feeling of solitude

could not be achieved. However, the vast majority of the WSA will not be affected and a visitor could easily eliminate the impact by moving a few yards away from the development.

- Primitive or Unconfined Recreation

Opportunities for primitive or unconfined recreation are not outstanding in this WSA (see page 3-14) and they will be enhanced only a minor amount by the additional 5 miles of trail (Management Action 6) which will improve access for hikers, bird watchers, etc. Actions affecting naturalness as described above (Management Actions 1, 3, 5, 6, and 7) will also affect opportunities for primitive or unconfined recreation, but in most cases any negative effects could easily be avoided by moving a few yards away from the intrusion.

- Special Features

The Chemise Mountain WSA offers outstanding views of seascapes and natural vegetation. Visual impacts will mirror those described for naturalness, above. Views of the ocean will be virtually unaffected, but prescribed burning and trail construction and maintenance could impact some important natural foreground views. However, less than 2 percent of the WSA will be affected.

Conclusion

Prescribed burning, trail construction and maintenance, and helispot maintenance will create or maintain unnatural conditions and eliminate opportunities for solitude on 30 acres, while naturalness and solitude will be restored on 35 acres by removal and rehabilitation of the elk enclosure. Opportunities for primitive or unconfined recreation will be enhanced a minor amount with the construction of an additional 5 miles of hiking trail. Views of the ocean will be unaffected. Impacts to the area's scenic quality will mirror those described above for naturalness.

Impacts on the Reintroduction and Management of Roosevelt Elk

The management actions anticipated under the Proposed Action (see pages 2-18 and 2-21) will not influence the reintroduction and management of elk within the Chemise Mountain WSA. The prescribed burning of brush (Management Action 1, page 2-18) will open up areas that are difficult for elk to pass through and will increase the amount of available forage. However, the acreages involved are small (10 acres every 3 years) and the impact of these treatments on even small numbers of elk will probably not be measurable.

The Fire Management Actions (page 2-18) are actually maintenance of the status quo, and thus will not affect the elk. Benefits to the elk from fire will be partially offset by the trail construction and maintenance (Management Actions 6 and 7) and the resulting increase of about 750 visitor days per year. However, the disturbance to the elk from these visitors will be minor and will not affect the elk population or the success of the reintroduction effort.

Consequences

Conclusion

Impacts on the reintroduction of elk will be negligible. Minor beneficial impacts from prescribed burning will be partially offset by minor disturbance from increased visitor use of the area.

Adverse Impacts Which Cannot Be Avoided

The only unavoidable adverse impacts are the loss of vegetation and related losses of naturalness from trail construction and prescribed burning. These impacts are minor and could be reduced by proper site selection.

Relationship Between Local Short-term Uses of Man's Environments and the Maintenance and Enhancement of Long-term Productivity

If this WSA were designated wilderness, all present, short-term uses and management directions will continue because most of the area is currently being managed as a Primitive Area the objectives of which are the same as those for a wilderness area. The management actions under the Proposed Action will not affect any development options that might occur in the future (should Congress decide to reverse a wilderness designation) and long-term productivity will be preserved.

Irreversible and Irretrievable Commitments of Resources

The Proposed Action involves no irreversible or irretrievable commitments of resources.

NO WILDERNESS/NO ACTION ALTERNATIVE

Since the management actions under this alternative are the same as the management actions under the Proposed Action (see pages 2-18 and 2-21), the impacts of the two alternatives are virtually the same. The only differences relate to the protective nature of wilderness designation and the public's perception and reaction to wilderness designation.

Under wilderness designation, the WSA will be withdrawn from mineral entry. However, since there is no mineral development anticipated anyway, the withdrawal will have no impact except to eliminate even the possibility of development, unless, of course, Congress in the distant future eliminates the wilderness designation.

It is possible also that wilderness designation will give national publicity to the area and attract more visitors who in turn could affect the elk or the vegetation in some way, but such impacts will be very speculative, certainly negligible, and not related to the management actions.

For the above reasons, a detailed analysis of this alternative is not presented.

Chapter 5

Consultation & Coordination

CHAPTER 5

CONSULTATION AND COORDINATION

A considerable amount of consultation and coordination was accomplished as part of the scoping process (see pages 1-3 to 1-5). This Chapter is devoted primarily to comments received on the draft environmental impact statement through letters and two public hearings. Consistency with other plans is also discussed.

SUMMARY OF PUBLIC COMMENTS

A total of 515 oral and written comments on the King Range and Chemise Mountain WSAs environmental impact statement were submitted during the 90-day public review period. There were a total of 2,340 signatures.

In accordance with Council on Environmental Quality regulations (40 CFR 1503.4(b)) substantive comments were analyzed. Because of the large number of comments and the repetitive nature of the comments, some have been summarized on the following pages with the Bureau's response. Copies of representative letters or letters which are more easily responded to individually are included in this chapter.

Of the 515 comments, 475 only remarked on the recommendations without providing new data or comments on issues bearing directly on the EIS or impacts of the alternatives. Nonsubstantive comments are retained for use in the Wilderness Study Report but are not included in this document.

GENERAL RESPONSES

1. Several commenters argued that the administrative protection of primitive values by the 1974 King Range Management Program should not be equated with the protection offered by wilderness designation. We did not mean to imply that there is no difference in the level of protection that would be provided under wilderness designation or nondesignation of these areas. Our point is that there is already a high level of protection of the wilderness values of these areas. Wilderness values within King Range National Conservation Area are protected under the existing plan and it would be misleading to ignore protection which is currently applied. Wilderness values were protected by Federal agencies for decades prior to the Wilderness Act of 1964.

2. Commenters demanded more detailed site-specific descriptions of impacts to various resources.

   This environmental impact statement is an analysis on a general land use plan and is not a final implementation plan analysis (see definition of "tiering" (40 CFR 1508.28)). Site-specific environmental assessments will be prepared for the wilderness management plan or for other projects when proposed.

3. Better information regarding predator control was requested. As a result, the management actions regarding predator control have been revised. See Grazing Management Action 33, page 2-8.

4. The legal status of the Primitive Area designation for Chemise Mountain, and its legitimacy as the "No Action" Alternative were questioned.

   Designations such as "primitive area" are still in the code of Federal Regulations (43 CFR 8352 and 43 CFR 2071) and are still in effect. The designation is not the overall controlling factor; the management prescription for Chemise Mountain (Zone 4 in the 1974 Plan) is for primitive recreation and would be applied regardless of formal designation.

5. "Issues" were raised regarding the impact of vehicles on various resources.

   It is undeniable that some illegal uses of the public lands occur, ranging from poaching to marijuana cultivation. However, there is no evidence to substantiate the implication that impacts to wildlife by poaching are significant even with open roads and no full-time BLM law enforcement. Public access for hunters was analyzed in the initial King Range Management Program and subsequent plans and has the concurrence of the California Department of Fish and Game (which built some of these roads specifically for hunter access).

   There is only local, negligible damage to the watersheds by either legal or illegal vehicle use; vehicles are too severely constrained by the rugged terrain. Cultural resource sites which are prone to vehicle damage are successfully protected by barriers.

6. "Issues" were raised regarding the requirement of wilderness to protect the Mattole River watershed.

   Public land within the King Range National Conservation Area accounts for only about 10 percent of the Mattole River watershed. The BLM also manages scattered tracts outside the Conservation Area, but most of the watershed is privately owned and subject to logging, grazing, agriculture, timberland conversion, and residential use. It is unlikely that the small portion of the watershed that BLM manages is the prime source of any problems on the Mattole, particularly in view of the fact that the BLM-managed land is the least disturbed in the area. The Mattole watershed and fisheries do not require wilderness designation to be adequately protected and any wilderness alternative would not add significant protection to the watershed vis-à-vis the present management program.

CONSISTENCY WITH OTHER PLANS

KING RANGE WSA

The King Range WSA is entirely within Humboldt County, and much of it falls within the coastal zone under the purview of the California Coastal Commission. None of the consequences of wilderness designation are inconsistent with county or coastal policies or plans. Wilderness designation under the Proposed Action provides public coastal access for fishing and hiking, protects archeological resources, and protects the visual quality of the coastal streams and slope. Grazing would still be allowed on the grasslands immediately south of the Mattole River. All this is consistent with other existing plans.

The King Range WSA is included in the Inventory of California Natural Areas published by the California Natural Areas Coordinating Council.

CHEMISE MOUNTAIN WSA

The Chemise Mountain WSA is within Mendocino and Humboldt counties, and is within the coastal zone which is under the purview of the California Coastal Commission. None of the consequences of wilderness designation are inconsistent with any of the coastal or county policies or plans, particularly because wilderness designation of an existing primitive area has little or no effect on land use.

Coordinated management of Chemise Mountain and the Sinkyone Wilderness State Park would provide outstanding recreational opportunities.

Chemise Mountain is included in the Inventory of California Natural Areas published by the California Natural Areas Coordinating Council.

COORDINATION WITH OTHER AGENCIES

During informal discussions in March, 1986, with the U.S. Fish and Wildlife Service (FWS) it became apparent that on WSAs where endangered species are present, FWS believes that wilderness designation or nondesignation would not, in itself, result in adverse impacts. To this end, Section 7 consultations with the FWS will be deferred until there is a proposal to implement a management action that, in BLM's judgment, may affect a threatened or endangered species.

DISTRIBUTION OF THE DRAFT EIS

The following agencies and organizations received copies of the draft EIS. In addition, copies were sent to over 200 individuals.

FEDERAL AGENCIES

Environmental Protection Agency, San Francisco, CA and Washington, D.C.
Bureau of Mines, Washington, D.C.
Bureau of Reclamation, Washington, D.C.
Bureau of Indian Affairs, Washington, D.C.
U.S. Geological Survey, Washington, D.C.
Soil Conservation Service, Washington, D.C.
Corps of Engineers, Washington, D.C.
U.S. Air Force, Washington, D.C.
Department of Energy, Washington, D.C.
Federal Energy Regulatory Commission, Washington, D.C.
Department of Transportation, Washington, D.C.
Federal Aviation Administration, Washington, D.C.
Federal Highway Administration, Washington, D.C.
Forest Service, Lassen National Forest, Fall River Mills, CA
Forest Service, Six Rivers National Forest, Eureka, CA
Forest Service, Washington, D.C.
BLM, Susanville, Sacramento, and Ukiah, California; Washington, D.C.

CONGRESSIONAL REPRESENTATIVES

Douglas H. Bosco, U.S. House of Representatives, District 1, Santa Rosa, CA and Washington, D.C.

Alan Cranston, U.S. Senate, San Francisco, CA
Pete Wilson, U.S. Senate, San Francisco, CA

STATE AGENCIES

California Coastal Commission, Eureka, CA
California Department of Fish & Game, Eureka, Sacramento, and Redding, CA
California Department of Forestry, Fortuna, CA
California Department of Parks and Recreation, Sacramento and Carlotta, CA
California Department of Water Resources, Red Bluff, CA
California State Clearinghouse, Sacramento, CA
California State Lands Commission, Sacramento, CA
California Water Quality Control Board, Santa Rosa, CA
Humboldt State University, Arcata, CA
Sonoma State University, Rohnert Park, CA
University of California, Davis, CA

STATE LEGISLATORS

Dan Hauser, California State Assembly, Sacramento and Eureka, CA
Barry Keene, California State Senate, Sacramento and Vallejo, CA

LOCAL AGENCIES

Humboldt County:
- Assessor, Eureka, CA
- Board of Supervisors, Eureka, CA
- Library, Eureka, CA
- Parks Departments, Eureka, CA
- Planning Department, Eureka, CA
- Public Works Department, Eureka, CA

Mendocino County:
- Air Pollution Control District, Ukiah, CA
- Assessor, Ukiah, CA
- Library, Ukiah, CA
- Planning Department, Ukiah, CA
- Public Works Department, Ukiah, CA

ORGANIZATIONS

ARCOEX Exploration Company, Denver, CO
Association of Resource Conservation Districts, Sacramento, CA
Atlantic Richfield Company, Denver, CO
Audubon Society, Eureka, CA
Bachelor's Inc., Sacramento, CA
Banning Sportsman Club, Benning, CA
Bear Creek Watershed Association, Whitethorn, CA
Beginners, Inc., Redway, CA
Biosystems Analysis GGNRA, Sausalito, CA
Briceland Corporation, Whitethorn, CA
California Association of Four-Wheel Drive Clubs, Sacramento, CA
California Cattlemen's Association, Sacramento, CA
California Explorer, Mill Valley, CA
California Farm Bureau Administration, Sacramento, CA
California Native Plant Society, Davis, Eureka, Berkeley, Gualala, Potter Valley, Sloughhouse, Tiburon, and Ukiah, CA
California State Automobile Association, San Francisco, CA
California Trappers Association, Napa, CA
California Trout, San Francisco, CA
California Wilderness Coalition, Davis, CA
California Woodgrowers Association, Ferndale, CA
Chamber of Commerce, Sacramento, CA
Chevron Resources, San Francisco, CA
County Supervisors Association of California, Sacramento, CA
Cultural Resource Management, Inc., Davis, CA
Dry Creek Valley Association, Healdsbury, CA
Emerald Pond Forest Products, Santa Ana, CA
EPIC, Inc., Garberville, CA
Forest Lands and Products Company, Phillipsville, CA
Friends of Del Norte County, Gasquet, CA
High Ridge Lumber Company, Yreka, CA
Homestake Mining Company, Reno, NV

Humboldt-Del Norte Cattlemen's Association, Eureka, CA
International Woolworkers of American, Fort Bragg, CA
KQED TV Channel 9, San Francisco, CA
Laterite Correspondence Center, Crescent City, CA
League of Women Voters, Eureka, CA
Louisiana-Pacific Corporation, Ukiah and Alderpoint, CA
Madrone Council, Redway, CA
Marin County Motorcycle Association, Petaluma, CA
Mattole Center for Science and Education, Honeydew, CA
Mattole Grange, Garberville, CA
Mattole Resource Council, Arcata, CA
Mattole Restoration Council, Honeydew, CA
Mattole Watershed Taxpapers Association, Garberville, CA
Mendocino County Cattlemen's Association, Willits, CA
Mendocino County Fish and Game Advisory Council, Ukiah, CA
Minerals Exploration Coalition, Denver, CO
NACENR, Arcata, CA
Matove American Heritage Commission, Sacramento, CA
Natural Resources Defense Council, San Francisco, CA
North Coast Environmental Center, Arcata, CA
Northern California Fishermen's Wives, Fort Bragg, CA
Pacific Gas & Electric Company, San Francisco, CA
Piercy Craftwsorks, Piercy, CA
Press Democrat, Ukiah, CA
Rancho Punta Gorda, Petrolia, CA
Red Mountain Association, Leggett, CA
Redwood Empire Four-Wheelers, Eureka, CA
Redwood Empire 4-4 Club, McKinleyville, CA
Redwood Gun Club, Arcata, CA
Regional Council of Rural Counties, Sacramento, CA
Sandeepany West, Piercy, CA
Save-the-Redwoods League, San Francisco, CA
Self and Shooters, Alhambra, CA
Sierra Club, San Francisco, Napa, Trinidad, Arcata and Fort Bragg, CA; Washington, D.C.
Sierra Pacific Industries, Arcata, CA
Southern Califoria Edison, Sacramento, CA
The Cuttings, Garberville, CA
The Environment Radio Show, Albion, CA
The Nature Conservancy, San Francisco, CA
The Trust for Public Lands, San Francisco, CA
The Wilderness Society, San Francisco, Arcata, and Trinidad, CA
Thermal Power Company, San Francisco, CA
Times-Standard, Eureka, CA
Tom Long Watershed Association, Garberville, CA
Ukiah BLM District Advisory Council
Ukiah Stone & Gem Club, Redwood Valley, CA
Union Oil Company of California, Indio and Santa Rosa, CA
VTN Consolidated, Inc., Irvine, CA
Western Surfing Association, Trinidad, CA
Wildlife Management Institute, Portland, OR

COMMENT LETTERS AND RESPONSES

The following 16 comment letters (Table 4) have been selected for reprinting and direct response in this document because they raise questions about the conclusions, analysis, and data in the draft EIS that are not responded to in the "Summary of Public Comments" section, above. The responses start on page 5-50 immediately following the letters.

Table 4
Index to Comment Letters

Letter Number		Page
	Federal Agencies	
1.	Bureau of Mines, Spokane, WA	
2.	Environmental Protection Agency, San Francisco, CA	
	State Agencies	
3.	The Resources Agency	
	Local Agencies	
4.	Humboldt County Board of Supervisors	
	Organizations	
5.	California Wilderness Coalition	
6.	Environmental Protection Information Center	
7.	Lost Coast League	
8.	Mattole Valley Community Center	
9.	Society for the Protection of Nature in Israel	
10.	The Wilderness Society	
	Individuals	
11.	Allan L. Bellon	
12.	Douglas Fir	
13.	Don and Maryl Morris	
14.	Russell Hill	
15.	Harold W. Wood	
16.	Lillian Bieber, et al.	

COMMENT LETTER 1

United States Department of the Interior

BUREAU OF MINES

WESTERN FIELD OPERATIONS CENTER
EAST 360 3RD AVENUE
SPOKANE, WASHINGTON 99202

May 1, 1987

Memorandum

To: District Manager, Ukiah District Office, Bureau of Land Management, Ukiah, California

From: Supervisor, Minerals Involvement Section

Subject: Review of Draft Environmental Impact Statement for the King Range Wilderness Study Area (WSA) and the Chemise Mountain WSA in the Arcata Resource Area, California

In the section describing affected environment, the mineral potential of the King Range and Chemise Mountain WSAs is described as low to moderate. However, in the Environmental Consequences section, the mineral potential is described as low to nonexistent! In addition, it is stated that wilderness designation of these areas would have no effect on mineral resources.

1-1 Both statements are in error. Obviously, if the mineral potential is low to moderate, it cannot be low to nonexistent. We would like to emphasize that low potential does not mean no potential. Deposits of economic value may well be found in areas of low potential. Even if the potential is low, wilderness designation will definitely have an effect, in that whatever minerals exist there will not be available for development after designation.

In the discussion of issues on page 1-7, the Minerals/Energy section, we do not understand either the definition or, frankly, the need for the word "nuisance" in the statement, "Mineral potential is low, but there is the possibility of nuisance developments." The negative connotation implied by the use of the
1-2 term "nuisance" has no place in a professional, supposedly impartial analysis. Mining industry representatives have often suspected a negative policy in local specific cases, but we question whether the Bureau of Land Management as a Federal agency desires to formally infer such a policy.

We recommend that mineral concerns be reconsidered in a more professional and comprehensive manner in the final version.

D'Arcy P. Banister

COMMENT LETTER 2

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, CA 94105

To		Initial	Date
1	SD		
2	ASD		
	ADMIN		
3	RES		7/10
	OPER		
	Materials		
	EEO		

Action by 3
Surname by
Return to

July 3, 1985

Edward L. Hastey, State Director
U.S. Bureau of Land Management
California State Office
Room E2853
2800 Cottage Way
Sacramento, California 95825

Dear Mr. Hastey:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) titled PRELIMINARY WILDERNESS RECOMMENDATIONS FOR THE ARACTA RESOURCE AREA; CHEMISE MOUNTAIN WILDERNESS STUDY AREA (WSA) AND KINGS RANGE WSA; MENDOCINO AND HUMBOLDT COUNTIES, CALIFORNIA.

We have classified this DEIS as category LO, Lack of Objections (see attached "Summary of Rating Definitions and Follow-Up Actions"). The classification and date of EPA's comments will be published in the Federal Register in accordance with our public disclosure responsibilities under Section 309 of the Clean Air Act. We concur with the action described in the Preferred Alternative; we offer the following comments on this DEIS.

2-1 EPA is concerned about impacts on water resources, riparian communities and aquatic organisms from the potential degradation of water quality. The Final Environmental Impact Statement (FEIS) should include resource maps for each WSA that identify biologically sensitive areas which may need special management to reduce environmental impacts. The identified areas should be discussed in the text of the FEIS and mitigation should be proposed to minimize any potentially
2-2 adverse impacts on water quality from grazing activities, road construction and maintenance, potential timber industry operations and stream clearing work.

We appreciate the opportunity to review this DEIS. Please send four copies of the FEIS to this office at the same time it is officially filed with our Washington, D.C. office. If you have any questions, please contact Patrick J. Cotter, Federal Activities Branch, at (415) 974-0948 or FTS 454-0948.

Sincerely yours,

Charles W. Murray, Jr.
Assistant Regional Administrator
for Policy and Management

cc: Van W. Manning; BLM District Manager; Ukiah, California

Enclosure (1 page)

COMMENT LETTER 3

Resources Building
1416 Ninth Street
95814

(916) 445-5656

Department of Conservation
Department of Fish and Game
Department of Forestry
Department of Boating and Waterways
Department of Parks and Recreation
Department of Water Resources
California Conservation Corps

GEORGE DEUKMEJIAN
GOVERNOR OF
CALIFORNIA

THE RESOURCES AGENCY OF CALIFORNIA
SACRAMENTO, CALIFORNIA

Air Resources Board
California Coastal Commission
California Waste Management Board
Colorado River Board
Energy Resources Conservation and Development Commission
San Francisco Bay Conservation and Development Commission
State Coastal Conservancy
State Lands Commission
State Reclamation Board
State Water Resources Control Board
Regional Water Quality Control Boards

Mr. Timothy Julius
Bureau of Land Management
555 Leslie Street, Box 940
Ukiah, CA 95482

June 28, 1985

Dear Mr. Julius:

The State has reviewed the draft EIS, Preliminary Wilderness Recommendations, Arcata Resource Area, submitted through the Office of Planning and Research. Review was coordinated with the Coastal Commission, Water Resources Control Board, and Departments of Conservation, Fish and Game, Forestry, Parks and Recreation, Health, and Transportation.

The Coastal Commission has already commented directly to you on this project by letters of April 12, 1984 and June 19, 1985.

3-1 The Department of Fish and Game supports the preferred alternative for Kings Range WSA, if BLM adds the West Fork Honeydew Creek area, which was originally justified for its wildlife qualities (i.e., spotted owls, goshawks, bald eagle roost, excellent trout fishery, and old-growth forest qualities).

3-2 The Department also supports the recommended decision to manage the Chemise Mountain WSA as a primitive area.

3-3 The Department of Parks and Recreation comments that it will need to work closely with BLM to resolve common problems (such as property ownership). Much of the land shown on maps 2-6 and 2-7 as private property is actually part of Sinkyone Wilderness State Park. Any questions regarding these comments may be directed to Jim Quayle at (916) 445-9299 or P.O. Box 2390, Sacramento 95811.

3-4 The Department of Conservation comments that the assessment of mineral resource impacts may be inconsistent. The report states that the potential for economic development (King Range WSA) is low to non-existent, while U.S.G.S. and the U.S. Bureau of Mines assign it a low-to-moderate potential. The report's rationale for this conclusion is not readily apparent. Withdrawal of lands classified as low-to-moderate mineral resource potential would have an impact. The document also does not explain the current resource policies for the Chemise Mountain WSA. The Department recommends that the final EIS include a thorough discussion of the criteria and methods used to determine that a WSA designation for these areas would have no impact on mineral resources development.

If you have any questions regarding the Department of Conservation's comments, please contact Robert Streitz, (916) 322-3202.

Thank you for providing an opportunity to review this document.

Sincerely,

Charles K. Dahlquist

for Gordon F. Snow, Ph.D
Assistant Secretary for Resources

cc: Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

(SCH 85040207)

State of California, George Deukmejian, Governor

California Coastal Commission
NORTH COAST DISTRICT
350 E Street, 4th Floor
P.O. Box 4946
Eureka, CA 95501
(707) 443-1623

June 19, 1985

Ken Fellows
Office of Planning & Research
State Clearinghouse
1400 10th Street, Rm 121
Sacramento, California 95814

Re: SCH 85040207
Draft EIS, Preliminary Wilderness Recommendations for Chemise Mountain WSA and King Range WSA

Dear Mr. Fellows:

Thank you for the opportunity to comment on the preliminary Wilderness Recommendations for the Arcata Resource Area as proposed in the draft Environmental Impact Statement prepared by the U.S. Department of Interior's Bureau of Land Management. Portions of the King Range and Chemise Mountain Wilderness Study Areas (WSA) are within the coastal zone.

3-5 Our response to the Bureau's Notice of Preparation was submitted on April 12, 1984, and is attached. Our comments had requested that specific information be included in the EIS concerning a variety of resources and existing uses thereof, in addition to an analysis of projected impacts that wilderness designation would have on the resources or on the use of the resources. The specific resource information should have been included in the DEIS, but was not. We again request that this information be provided and that it be analyzed prior to finalizing of wilderness recommendations.

In addition, we offer the following comment on the draft EIS (DEIS):

3-6 A. Public Access and Recreation. The BLM's recently adopted recreation plan for the King Range should be included in the EIS information and analysis because it provides a base of information on existing recreational

3-7 uses and projected demands and improvements. The use of ORV's between the mouth of the Mattole River and Shelter

Cove should be addressed in the EIS because of the potential conflicts between vehicular use and wilderness protection. The certified portion of Humboldt County's Southcoast Area Plan, which includes a large portion of the KRNCA, contains a policy that provides for commercial off-road vehicle access (i.e., street legal vehicles for commercial fishing and commercial wood gathering purposes) from the mouth of the Mattole River south to Punta Gorda and from Gitchell Creek south to Telegraph Creek. A 50 year lease agreement between BLM and the State Lands Commission allows the BLM to enforce the closure of vehicle access north of Gitchell Creek and seaward of the Mean High Tide line (State Lands Commission's jurisdiction). in addition to enforcing no vehicle access upland of the MHT (BLM's jurisdiction). Wilderness areas are not adequately protected when threatened with impacts to intertidal habitat areas, coastal streams, dune vegetation, archaeological resources and marine mammals resulting from use or misuse of off-road vehicles. To allow off road vehicular use in an isolated area difficult to police, that contains sensitive resources, is an invitation to conflicts with resource protection.

3-8 The draft EIS states that the acquisition of private lands will continue, that vehicular access to state or privately owned land surrounded by wilderness will be guaranteed, that administrative access is necessary for proper managment of the area, and that several access routes may be used for vehicular access under all (wilderness) alternatives. The EIS does not include a sunset clause on roads to be abandoned once the acquisition of private lands occurs and vehicle access is no longer necessary. We support the continued acquisition of private in-holdings and further support the abandonment of roads and restoration of land where vehicle access is no longer warranted. As private lands and existing improvements are acquired, consideration should be given to use of abandoned cabins as primitive camp shelter or hostel-type facilities.

3-9 The Chemise Mountain WSA should be analyzed in conjunction with its proximity to the Sinkyone Wilderness State Park, including existing or proposed inter-connecting trails. A joint wilderness management agreement between BLM and the California Department of Parks and Recrations would be appropriate for this area.

3-10 B. Marine Resources, Fisheries and Water Quality. The draft EIS should address the existence of an Area of Special Biological Significance, designated by the State Water Resources Control Board and located along the shoreline for the length of the KRNCA. An interagency management agreement between the BLM and the State Water

Resources Control Board should be developed and implemented in conjunction with wilderness designation.

C. Environmentally Sensitive Habitats. The sensitive intertidal habitat area in the State's designated ASBS should be addressed in the draft EIS. The impacts of vehicular access to sensitive resources including dune vegetation, coastal streams and riparian vegetation, and intertidal habitat areas have not been given consideration in the DEIS. We recommend that these resource impacts be analyzed and addressed in terms of how wilderness designation could modify or substantially reduce these impacts.

D. Agriculture and Timberlands. As privately owned lands are purchased by the BLM, uses that conflict with resource and wilderness protection should be curtailed, roads should be abandoned and the land restored. Other existing improvements, such as former ranching cabins could be used as primitive camping facilities, and fenced or corralled areas could be used by both commercial and non-commercial recreational livestock users.

3-11 E. Scenic and Cultural Resources. The scenic resources, especially with regard to the Chemise Mountain WSA, should be considered within the context of its proximity to the King Range WSA and the Sinkyone Wilderness State Park. Cultural resources are vulnerable to impacts from vehicles, especially in remote areas.

3-12 F. Hazards. Management of the area for fire hazard protection should be addressed in the DEIS. Alternatives consistent with wilderness managment should be emphasized. The DEIS should note where fire roads are to be maintained, and should address other methods of access and fire control.

3-13 G. Minerals. Existing mineral resources and mining claims and leases should be described in more detail. What kinds of mineral uses would be permitted to continue after wilderness designations? Consideration should be given to limiting mining entry, closing out existing mining claims, restricting blastings, controlling over-tailings, and restoring impacted areas, consistent with coastal resource protection policies.

3-14 Proposed lease sales in adjacent areas of the OCS could adversely affect wilderness values and resource areas. Consideration should be given to an inter-departmental management agreement for managing adjacent offshore areas in conformance with Wilderness Management Policy goals and objectives.

3-15 H. Air Quality. To what extent will potential industrial development within the surrounding region effect changes in air quality managment of a wilderness area?

By providing a more detailed description, mapping and analysis of the area's resources as suggested above and in the attached letter of April 12, 1984, we feel that the inherent values of the resources will be manifested, and will thereby mandate the full degree of protection afforded through wilderness designation alternative 2 for the King Range WSA and alternative 1 for the Chemise Mountain WSA. Coastal wilderness areas are particularly scarce resource areas. The designation of the King Range and Chemise Mountain WSA's as wilderness will provide the only significant wilderness area between the Siuslaw National Forest and Point Reyes National Seashore, a distance of approximately 600 miles, and will be only one of four wilderness areas on the Pacific Coast. The relative isolation and undisturbed nature of the King Range/Chemise Mountain WSA's coupled with the proximity of State Wilderness Areas and offshore habitat areas (ASBS), reinforce the wilderness characteristics and values of this region. The important coastal resources described in our comments and in the draft EIS deserve the full measure of protection provided by wilderness designation.

As a final note, federal activities which directly affect the coastal zone must be consistent with State Coastal Zone Management Programs to the maximum extent practicable, as required in the Federal Coastal Zone Management Act. If the BLM determines that the proposed amendment to the KRNCA management plan will directly affect the coastal zone, a consistency determination for the project should be prepared pursuant to CFR 930.34. The consistency determination for the preferred alternative may be included as part of the FEIS. For information on federal consistency review procedures, please contact either Liz Fuchs or Mary Hudson in our San Francisco office at (415)543-8555.

Thank you again for consulting with the California Coastal Commission. We will be happy to provide additional information. Please feel welcome to contact us if you have questions concerning these comments.

Sincerely,

B. Noah

for RICHARD G. RAYBURN
District Director

LGE:jp

cc: Liz Fuchs
Mary Hudson
Timothy Julius, BLM
10111

COMMENT LETTER 4

BOARD OF SUPERVISORS
COUNTY OF HUMBOLDT
825 5TH STREET
EUREKA, CALIFORNIA 95501-1172 PHONE (707) 445-7471

August 5, 1985

Edward Hastey, Director
Bureau of Land Management
Federal Offices
2800 Cottage Way
E-2841
Sacramento, CA. 95825

Dear Mr. Hastey:

The Humboldt County Board of Supervisors on July 11, 1985, considered comments on the draft Environmental Impact Statement concerning the Kings Range Wilderness Study area and management of the Kings Range National Conservation area. The Board after considerable discussion, agreed with the recommendation of the Ad Hoc Committee in support of Alternative 4, which calls for 14,000 acres of wilderness as most practical and least impactive on traditional uses within the study area.

4-1 The Board also indicated a concern that modern wildfire suppression techniques be allowed within the designated wilderness area in order to protect the surrounding areas from the damage of unchecked wildfires.

The Board appreciates the opportunity to comment on the management plan alternative and their impacts on both users of the study area lands and concerned neighbors.

Sincerely,

WESLEY CHESBRO
Chairman

WC:bjn

COMMENT LETTER 5

California Wilderness Coalition

2655 Portage Bay Avenue, Suite 3 • Davis, California 95616 • (916) 758-0380

July 1, 1985

Van W. Manning, District Manager
Bureau of Land Management
P.O. Box 940
Ukiah, CA 95482

Dear Mr. Manning:

The California Wilderness Coalition would like to take this opportunity to comment on the draft environmental impact statement for preliminary wilderness recommendations for the Chemise Mountain and King Range Wilderness Study Areas (WSAs). After carefully reviewing the document and consulting with our members, the California Wilderness Coalition supports the designation of the entire King Range National Conservation Area as wilderness, with the exception of a corridor to the Shelter Cove subdivision. This recommendation includes Alternative 1 for the Chemise Mountain WSA, Alternative 2 for the King Range WSA, closure of the beach to off-road vehicles, elimination of road corridors proposed by the Bureau of Land Management (BLM), and inclusion of additional lands not inventoried as roadless by BLM.

5-1 We can find no evidence that detailed wilderness studies were conducted on the WSAs. Most of the information in the environmental impact statement would have been available without any field work. As has been recently discovered in the Rocky Creek-Cache Creek WSA, close examination of an area may reveal remarkable wilderness and wildlife values previously unknown. We would like to see detailed studies conducted in each the two WSAs.

5-2 We also feel that the draft environmental impact statement is inadequate. The non-suitable recommendations are based on several often-repeated fallacies. The Environmental Consequences does not begin to consider the impacts of development activities on the WSAs if the lands are not afforded wilderness protection.

5-3 The range of alternatives does not represent a reasonable range of alternatives. The alternatives 1 and 2 for the King Range WSA are not All Wilderness alternatives because of road corridors, predator control measures, and off-road vehicle use of the beach. An alternative with none of those exceptions must be offered in the EIS. The No Action alternative for the Chemise Mountain WSA recommends continuing a designation which will become obsolete with the consideration of the WSA by Congress.

The Chapter on Affected Environment is in itself the strongest recommendation for both WSAs being designated as wilderness. The values of these wild areas are amazing. The failure of the BLM to recognize these values and recommend wilderness for the areas is puzzling.

The following are our specific comments on the draft environmental impact statement:

Page 1-6: The fact that only 21 responses to the scoping letter were received should not be surprising. Most citizens are not even aware of what "scoping" is in the environmental review process. In addition, if a single person or organization raises all the issues that concern others, there is no need for additional people to raise the same point.

5-4 Page 1-6: It is mentioned that Alternative 4 is the recommendation of the Ukiah District Advisory Council after hearing the Technical Review Team report. The EIS fails to mention that Alternative 4 is substantially different from the report submitted by the Technical Review Team

Since the technical review team process is so proudly touted for wilderness reviews in the Susanville District, we find it interesting that this EIS only acknowledges the existence of the technical review team on one page.

5-5 Page 2-2: The first sentance of this page would be better if "could be allowed" were substituted for "would be allowed" since most of the following example are uses which "may" be allowed. Also, the examples are a mixture of uses authorized by the Wilderness Act of 1964 and interpretations by the Bureau of Land Management. Vegetative manipulation projects and predator control, for example, are not mentioned in the Wilderness Act. It would be much better if those uses expressly identified by the Wilderness Act were separated from those which are the result of intrepretations by the Bureau of Land Management.

5-6 Page 2-3: The restriction of analysis of issues addressed in the 1974 final environmental statement for the King Range National Conservation Area by itself invalidates this current environmental impact statement. The 1974 plan was adopted prior to the passage of the Federal Land Policy and Management Act of 1976 which authorized the wilderness review and additions to the King Range National Conservation Area. The eleven-year-old plan is not chiseled in stone with no changes possible; indeed, the plan will be amended when the wilderness recommendations are adopted. By refusing to consider issues which directly affect wilderness designation, such as off-road vehicles on the beach, the Bureau of Land Management has not considered a complete array of alternatives to the proposed action.

5-7 Page 2-4: It is stated that during the wilderness inventory several "roads" [emphasis in EIS] were identified that penetrate the WSA. If these were roads as identified in the Wilderness Inventory Handbook of September 27, 1978, the WSA boundary should have been modified to eliminate ~~the~~ them. Since this was not done, it must be assumed that these vehicle ways did not meet the definition of a road. A WSA, by definition, does not contain roads, although roads may form a boundary (including a cherrystem) to a WSA.

Owners of private land have legal access to their land in a WSA or a wilderness. BLM may consider administrative access by vehicle necessary for management and recommend such in their preferred alternative. BLM may even propose such access in some of their alternatives. But since there are no roads in a WSA, BLM may not require vehicular access inside a WSA in the All Wilderness alternative. Furthermore, BLM should not require access in all of the other alternatives which recommend a portion of the WSA as wilderness.

5-8 Page 2-5: Since the lands dropped from wilderness review by former Interior Secretary James Watt have been restored to study by a U.S. District Court on April 18, 1985, this is no longer the All Wilderness alternative.

Even before the court decision, this alternative did not qualify as an All Wilderness alternative due to proposed corridors within the WSA for vehicle access and a portion of the beach open to off-road vehicles.

5-9 The final intensive inventory for wilderness in California identifies the west boundary of the King Range WSA as the Pacific Ocean. Even if the boundary actually is mean high tide, consideration of the management of the beach below mean high tide must be considered in the all wilderness alternative. Since the State of California has a wilderness act applying to state lands similiar to the federal Wilderness Act of 1964, the All Wilderness alternative should consider the impact of designating the entire beach area adjacent to the WSA as a state wilderness area.

5-10 Page 2-6: The All Wilderness - Plus alternative now more closely reflects the required All Wilderness alternative. This alternative still does not qualify as an All Wilderness alternative due to proposed corridors within the WSA for vehicle access and a portion of the beach open to off-road vehicles.

In addition, this alternative should state that predator control, if allowed, would be under the constraints of the Wilderness Management Policy. This policy does not allow "efficient predator control ... for animals destroying livestock inside or outside the wilderness," as described in Alternative 2. The policy states that when predator control is be determined as necessary "on a case-by-case basis to prevent special and serious losses of domestic livestock, it will be accomplished by methods which are directed at eliminating the offending individuals while at the same time presenting the least possible hazard to other animals or to wilderness visitors." The policy further states "approval of predator control actions must be contingent upon a clear showing that the removal of the offending predators will not diminish the wilderness values of the area, because this kind of wildlife is an integral part of the wilderness, as well as an adjunct to the visitor's experience."

5-11 Page 2-11: Alternative 4 should state that predator control, if allowed, would be under the constraints of the Wilderness Management Policy. This policy does not state that "predator control would be allowed for those species that impact livestock operations either inside or outside the wilderness," as described in Alternative 4. The policy requires that when predator control is be determined as necessary "on a case-by-case basis to prevent special and serious losses of domestic livestock, it will be accomplished by methods which are directed at eliminating the offending individuals while at the same time presenting the least possible hazard to other animals or to wilderness visitors." The policy further states "approval of predator control actions must be contingent upon a clear showing that the removal of the offending predators will not diminish the wilderness values of the area, because this kind of wildlife is an integral part of the wilderness, as well as an adjunct to the visitor's experience."

Page 2-12: Alternative 5 should state that predator control, if allowed, would be under the constraints of the Wilderness Management Policy. This policy does not state that "predator control would be allowed for those species that impact livestock operations either inside or outside the wilderness," as described in Alternative 5. The policy requires that when predator control is be determined as

necessary "on a case-by-case basis to prevent special and serious losses of domestic livestock, it will be accomplished by methods which are directed at eliminating the offending individuals while at the same time presenting the least possible hazard to other animals or to wilderness visitors." The policy further states "approval of predator control actions must be contingent upon a clear showing that the removal of the offending predators will not diminish the wilderness values of the area, because this kind of wildlife is an integral part of the wilderness, as well as an adjunct to the visitor's experience."

5-12 Page 2-15: Regarding the elimination of the area east of the ridgeline in the recommended management program, the Wilderness Act of 1984 does not require an area to be unique nor does it require easily recognizable boundaries. It also is stated that the area has "large areas that have been logged and significantly impact the feeling of naturalness." In the Final Intensive Inventory, the natural condition of this WSA states that "man's impacts, which include some short roads, primitive ways, grazing, some logging, and cabins ... are substantially unnoticeable due to terrain variety and sheer distance. Overall, this remaining area appears to have been affected primarily by the forces of nature."

5-13 Gitchell Creek does not provide a natural boundary which eliminates conflicts with vehicle use on the beach between Gitchell Creek and Telegraph Creek. Members of the California Wilderness Coalition report that illegal vehicles are frequently seen north of Gitchell Creek.

5-14 It is stated that Willow Creek as a boundary would exclude areas with "relatively significant human disturbances." No such disturbances were recognized in the Final Intensive Inventory description for the King Range WSA. Instead, the Inventory description refers to the "25 miles of remote, nearly inaccessible coastline running from the mouth of the Mattole River south to Shelter Cove."

5-15 The Wilderness Act of 1964 precludes the BLM's proposal of keeping the option open of providing vehicular access for public and/or administrative uses inside a wilderness area.

5-16 There is no basis for the recommended management program to voilate the Wilderness Management Policy. This policy does not provide that "efficient, reasonable, predator control will be allowed even if such control may technically conflict with the guidelines in the Wilderness Management Policy." The policy states that when predator control is be determined as necessary "on a case-by-case basis to prevent special and serious losses of domestic livestock, it will be accomplished by methods which are diracted at eliminating the offending individuals while at the same time presenting the least possible hazard to other animals or to wilderness visitors." The policy further states "approval of predator control actions must be contingent upon a clear showing that the removal of the offending predators will not diminish the wilderness values of the area, because this kind of wildlife is an integral part of the wilderness, as well as an adjunct to the visitor's experience."

5-17 Page 2-16: We do not believe that the No Action alternative is a correct alternative. The special section of the Federal Land Management and Policy Act of 1976 applying to natural and primitive areas is similar to the review required for Forest Service primitive areas under the Wilderness Act of 1964. The primitive area designations were abolished by Congress during the reclassification of the areas. Since the differences between a primitive area and a wilderness are

administrative vs. legislative and open vs. withdrawn from mineral entry, it seems likely that Congress will abolish the BLM's primitive area designation when the WSA is reclassified. Therefore the No Action alternative should consider this probable course of action.

Page 2-19: The rationale for BLM's preliminary wilderness recommendation is faulty. Each of the four reasons for recommending the Chemise Mountain WSA as non-suitable are incorrect:

1) The proximity of Chemise Mountain to the Shelter Cove subdivision does not affect the suitability of the WSA. The paved road which makes up part of the WSA boundary certainly should suffice for the BLM's concern for "easily recognizable boundaries."

2) It is stated that off-site sights and sounds from private lands to the east significantly impact the feeling of solitude. Congress has made it clear that this is not an important criterion for wilderness designation. Almost all wilderness areas are affected by overflights by aircraft. The Castle Crags Wilderness is about one mile from Interstate 5 and the main north-south railway line in California. The San Jacinto Wilderness is about two miles from Interstate 10, a major freeway linking Los Angeles with Palm Springs. The two parts of the Yosemite Wilderness are separated by State Highway 120. The Chemise Mountain Wilderness Study Area under consideration in this environmental impact statement is subject to far less disturbance from off-site sights and sounds.

5-18

3) While the intent of wilderness may be similar to primitive area designation, the degree of statutory protection for the area certainly is not similar. One of the reasons the Wilderness Act of 1964 was written was because administrative designations were be changed to allow for development of wild areas.
4) Users are not confined to trails. While cross-country travel is extremely difficult in this WSA, it certainly offers outstanding opportunities for a primitive and unconfined type of recreation. Under the BLM's interpretation, the Grand Canyon would not offer opportunities for primitive and unconfined recreation.

The only differences between a primitive area and a wilderness given in this EIS are administrative vs. legislative and open vs. withdrawn from mineral entry. Therefore, the statement that primitive area status would not have "to meet the stricter mandatory requirements of wilderness designation" is without merit.

5-19 Page 2-20: The impacts listed for Recreation that involve vehicular access are in error as mentioned in above comments.

5-20 Page 3-15: The statement regarding a lack of outstanding opportunities for primitive and unconfined types of recreation are in error as mentioned in above comments.

Page 4-2: The opening of the Smith-Etter road under all alternatives does not provide for a complete array of alternatives as mentioned in above comments.

5-21 Page 4-4: The opening of the Smith-Etter, Telegraph Ridge, and Saddle Mountain roads under all alternatives does not provide for a complete array of alternatives as mentioned in above comments.

5-22 Page 4-5: There is no basis for predator control which will voilate the Wilderness Management Policy. This policy does not provide that "efficient, reasonable, predator control will be allowed even if such control may technically conflict with the guidelines in the Wilderness Management Policy." The policy states that when predator control is be determined as necessary "on a case-by-case basis to prevent special and serious losses of domestic livestock, it will be accomplished by methods which are directed at eliminating the offending individuals while at the same time presenting the least possible hazard to other animals or to wilderness visitors." The policy further states "approval of predator control actions must be contingent upon a clear showing that the removal of the offending predators will not diminish the wilderness values of the area, because this kind of wildlife is an integral part of the wilderness, as well as an adjunct to the visitor's experience."

5-23 The statement that "the only potential loss of wilderness characteristics by nondesignation would be by logging activities in Zone 6 and 7, and these areas are not as unique as the west slope" does not address "Unavoidable Adverse Impacts." Not only does this section fail to consider the impacts of logging, it ignores other impacts such as the proposed road corridors and the use of off-road vehicles on the beach. The section does not meet the requirement of the National Environmental Policy Act to consider Unavoidable Adverse Impacts. Page 4-6: The section on Irreversible/Irretrievable Commitment of Resources is totally inadequate. A number of resources, especially rare, threatened, or endangered wildlife, should be considered in this section.

If "in the King Range, ... such disturbances quickly heal to the point that they are virtually unnoticeable," the BLM erred in not identifying the entire King Range National Conservation Area as a Wilderness Study Area. The point made here is exactly that made by wilderness advocates who recommend that nearly the entire conservation area be designated as wilderness.

Page 4-7: Just as the similarities between the intent of Primitive Area designation and wilderness designation are so obvious, the failure of the BLM to recommend Chemise Mountain as suitable for wilderness is too obvious.

Thank you for this opportunity to comment on the draft environmental impact statement for preliminary wilderness recommendations for the Chemise Mountain and King Range Wilderness Study Areas.

Sincerely,

Jim Eaton

Jim Eaton
Executive Director

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July 2,1985

Van Mahning, Manager
Ukiah District
Bureau of Land Management
555 Leslie St.
Ukiah, CA.
95482

Dear Van,

Enclosed you will find my comments on the King Range and Chemise Mtn. Wilderness Study Areas. Although I felt that you and the staff were very friendly and helpful during my visits to the BLM offices in Arcata and Ukiah, many questions remain unanswered. These have come up again in my comments and I hope to get an opportunity to submit further comments. I would like to reserve the right to search records and to be able to comment in the form of addendums throughout the wilderness study. I was discouraged by the evasiveness I felt when I asked direct questions and was disappointed that a file clerk was not available , I didn't want to bother people who were working.

I look forward to your response to the public comments submitted during the hearings and in written comment period and urge you take them into consideration by offering a real wilderness alternative. Thankyou!

Sincerely,

Cecelia Gregori

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The King Range (BLM # CA-050-112) and Chemise Mtn. (BLM # CA-050-111) [illegible] meet all the mandatory wilderness characteristics. The quality of these characteristics are outstanding and [illegible] reinforce [illegible] the wilderness sense of other special [illegible] characteristics represented in the multitude of natural plant and animal communities. The preservation of these areas as wilderness will expand the National Wilderness Preservation System to include the first coastal wilderness preserve isolated from development and major highways. *On the other hand more than 75 ORV parks in Calif. were listed in 1985. The trail will be over 50 miles with the addition of the trail system established in the Sinkyone Wilderness to the South. Both areas are within 4 days drive of major metropolitan areas. There are numerous multiple resource benefits which only wilderness designation can ensure.(pgs. 5104-106 FR 47)

6-1 Size: The King Range Wilderness would logically include all the old-growth forest identified in the 1981 Raptor Study (Jim Decker in units 6&7) including portions in Big Finley and Lost Creek. In addition, provisions for a contiguous trail to Chemise Mtn. and the Sinkyone Wilderness should be made. These documents for the King Range suggest no soil disturbing activities and a prohibition of road construction in the zones 5-6-7 (UMA 1978) all contain headwaters of significant tributaries of the Eel River. In keeping with good watershed management objectives to " stabilize soil resources, maintain and protect water yield , reduce flooding on and off site " the peripheral boundaries of a suitable wilderness should be considered along natural ones like watershed drainages and possible recovery areas rather than artificial and arbitrary ones such as roads.

BLM is required to keep these objectives in mind also under directive from FLPMA to consider the ' benefits that wilderness [illegible] tion can only ensure for both on-site and off-site ' [illegible] occur in the future as a 'result of the protective status of Wilderness Designation and natural processes ' This would include return of native species (ie. King and Silver Salmon to the Mattole), protection of habitat and natural plant and animal communities (FR 47, 5106 #3 A,B,C). BLM is required to focus on MULTIPLE natural values not primarily recreational public uses or "not necessarily the combination of uses that will produce the greatest economic return or greatest unit output" (FLPMA Sec. 103(c) and Interim Management Policy IMP 1979).

Another logical extension then includes Honeydew Creek, Squaw Creek and the northern extension area encompassing the entire system at the Mouth of the Mattole, which need protection from overmanagement and intensive logging and recreational impacts.

Naturalness: The values of this 'Last Coast' have long been recognized as outstanding. Because of it's isolation it has kept it's natural character. Disturbances created by conflicting uses including [illegible] logging, illegal ORV use, forest development [illegible] 6-2 [illegible] I.R. (see Appendix). [illegible] Instant Study Area [illegible] of their naturalness, the opportunities for wildlife [illegible] of adverse influences on these characteristics [illegible] 6-3 Special Features. [illegible] should also be addressed in light of original inventory and IMP.

The DEIS pg.3-2 interprets primitive and unconfined recreation to mean use of ' network of trails, roads, and beach access' Where is use of vechiles, and opening of permanent access to fragile and formerly inaccessible areas of KRNCA, which is prohibited by the Wilderness Act, described in terms of environmental impacts ? The Wilderness Study Policy 1981 describes it differently than the DEIS "refers to those activities that provide dispersed, undeveloped recreation which do not require facilities or MOTORIZED equipment" (FR 47 5105 B(2).

Special Features: A number of studies support the existience of wildlife and natural areas of the KRNCA to be far more significant and fragile than the DEIS or the original plan in 1974 indicate, In general these values are understated in the descriptions on pages3-5 to 3-17 and also in significant impacts which are probable with proposed alternate uses pages 4-1to 4-7.

a. BLM's URA and MFP contain references to abundant wildlife including endangered species.

b. 13 Areas of Environmental Concern in the King Range Area were listed in An Ecological Characterization of the Central and Northern Region Vol.4 Chpt.7, pg. 219 Oct.1981 USFWS and BLM/POCSO Dept. of Interior. This study also identified significant wildlife habitat and reinforced findings listed in the URA and MFP. Listed 258 species of Birds using King Range.

c. A June Study conducted at the Mouth of the Mattole [illegible] Humboldt State University [illegible] Bell [illegible] of human impacts [illegible] LMP [illegible] ORV use on a natural dune system.

d. A study done by the Nature Conservancy [illegible] rich wildlife and raptor habitat in Honeydew Creek. This was also reinforced by the 1981 Raptor Study done by Jim Becker of BLM that confirms that Honeydew Creek is 'the last significant habitat for Spotted Owl in S.W. Humboldt'. (Nature Conservancy 1983 Study of Old Growth Reserves for BLM). LOCATED 191 bird species & 37 herbs & plants

e. The California Water Quality Control Board report on

t e KRNCA A.S.B.S. says about the beach zones " this area and it's sensory qualities and forms of life it supports comprise perhaps the outstanding attraction to visitors " The BLM visitors survey states that 85% of the visitors hiked or viewed wildlife. And Also state the area is remote (no road access) is main reason it was chosen as a candidate for designation. (Personal comment Jim Pst. NQCB.)

f. a recent catalouging of plant on Chemise Mtn. showed up with 70 more plants than BLM identified in the DEIS.pg3-15

g. A list of Flora and Fauna of the King Range entered as Appendix A&B of EIS on the KRNCA 1974plan contains 19 pages, this is not indicated in the DEIS on these WSA's and NO new resource inventory is indicated as completed.

The King Range and Chemise Mtn. deserve full wilderness protection offered by legislation in order to preserve genetic diversity of natural communities represented there including:

- rare and endangered plants and animals
- diverse habitat types like coastal prairies, marine terraces climax chapparral fields, old-growth forests, tidepools, rookeries, estuary and dunes

The King Range and Chemise Mtn. as areas of scientific and educational value will become more important as availability of natural areas declines with increased pressure for development. Both these areas have been used extensively for research and for educational programs on restoration work or natural study. They are often the destination for camping and summer recreation for local and visiting school groups. The dynamic geology and significant archaeological finds (even those in zones 6&7 that qualify for the National Register) add up to outstanding features which are very susceptible to degradation due to vechile use and increased access.

6-4 Manageability; A clear definition of issues and valid uses i is missing from the DEIS, pages 1-6 to2-2, make general references in the evaluation of issues, actions common to all alternatives and standard practices, which include description of activities allowed in Wilderness areas. What is lacking here and in the Chapters 3 & 4 is a site specific analysis including the impacts of the proposed alternatives which is required by NEPA when over alternatives are considered in an EIS. In addition the MSP 1981 describes the formulation of alternatives as based on resolution of resource conflicts or problems with wilderness manageability (FR 46 pg 5112). DEIS P92-1

Further description of the vagueneness and inconsistencies of the DEIS will be found in what I'll call an appendix which contains specific references to the DEIS and base documents for the KRNCA. (see Appendix A).

6-5 The nature of the process through which the alternatives were formulated, was a highly politicized one. The basic flaw in the formulation of the alternatives for the King Range and Chemise Mtn. WSA's and preliminary wilderness recommendations was to restrict the analysis and scope of the issues by basing it on the FEIS for the 1974 KRNCA PLan. Some of these issues such as ORV use, cumulative impacts of existind uses on long term productivity and on the unstable erosional forces occurind in the King Range, fisheries restoration projects and state and federal contracts for this work, educational and cultural sites ;these and other issues were raised during the scoping and at the DAC meeting in August 15, 1984 prior to completion of the DEIS/ wilderness study.

6-6 The new direction in policy represented by the DAC and BLM alternatives was apparant in the TRT and DAC application of the criteria. Their comments focused on non-suitability of the area, referenced by the zone concept. The emergence of this alternate philosophy became evident when the TRT used a map with fragmented zones, different from the original zones for the management plan in the 1974 and their zone "5" became the basis for the DAC recommendation despite the fact that they didn't reach consensus.. This was contrary to FR 47 5108 /5112 (e)4 That the wilderness study is not supposed to refect the plan it is developed from and the basic thrust of the wilderness management should be considered. Were the alternatives developed as a result of new direction in policy as per FR47 pg.5109 / otherwise wouldn't there only be a need for a no action alternate to support the original management

6-7 The description of the scoping letters in the DEIS was also misleading(pg.1-5) and fails to show that five letters ,two with petitions, against wilderness and seven were recieved in favor. The wilderness file contains petitions with hundreds of signatures requesting that BLM keep the King Range wild and close it to ORV's. The BLM avoids the issues (pg.2-3 of DEIS) of ORV and vechile access, two which have the greatest probable impacts on the wilderness environment, by refering to the FEIS for the King Range 1974 plan for an account of the significnat environmental impacts.

After requesting a copy of the FEIS refered to on page 2-3 of the 1985 DEIS, three different times from Area Manager John Lloyd, and from Tim Julius in person at the Ukiah district office, Iwas told that the green KRNCA Management Program released in September 1974 was this very document. Not until I put it in writing with only a week left in the comment period did I view a copy of the REAL DEIS and FEIS for the KRNCA Management Plan 1974. A review of the FEIS indicates that the Draft was released to the public on May 31,1974 and the final on August 13,1974--- both of these documents seemed to have reached a select group or interagency review and was approved administratively. There was no hearing for the piblic on the DEIS or the FEIS on the 1974 plan. The hearings were held in Redway on April 6,1974 and focused on the proposed action only. The reason this is significant is becaused; Part of the EIS done on the 1974 Plan included the development of Alternative Philosophy pges 129-130 as required by law.

a.) An alternate for Full Preservation of the natural qualities of the KIng Range National Conservation AREA

B.) An alternate which outlined intensive resource development, which closely resembles the DAC alternate and the trend toward more intensive use intheBLM Alt.5

6-8 The King Range and Chemise Mtn. fulfill the critria for wilderness and the existence of this TOTAL WILDERNESS ALTERNATIVE which the public has never gotten to comment on -should have been enough for BLM to develop an allwilderness alternative which would prohibit ORV's on the beach and close access to remote areas, which would protect all forms of plant and animals and the communities andnatural areas , restoration of fisheries and degraded watersheds keep grazing to manageble and true pre-existing levels ... and one that would refect the OVERWHELMING public comment and participation in this wilderness study and the proposal made by the 'Lost Coast league. BLM has little choice but to listen to the prople and give us an opportunity to comment an an alternative for Total Wilderness Preservation in a supplemental DEIS.

Sincerely,

Cecelia Gregori

P I C

APPENDIX A

Inconsistencies and vagueness in the DEIS on the King Range and Chemise Mtn. WSA's :

1.) Manageability of the wilderness area has been muddied by the bias of the study outlined earlier and by the basic assumptions and postulates about valid existing rights in the DEIS. Several inconsistencies are evident in the DEIS

6-9 failing to identify real conflicts in use. There is a lack of evidence that many of these 'uses ' are 'grandfathered'. Contrary to the definition in FLMPA sec. 603(c) the DEIS is misleading on pages 2-1, 2-2, 2-5,2-6 as to which 'ACT' is the effective date to use as a baseline to guage rights. This vagueness continues throughout the DEIS whenever references are made to existing uses. The IMP describes these rights as those outstanding or under lease on October 21,1976 and that they could only continue to the 'manner and Degree' FLMPA Sec 603(c) authorized on that date so long as impacts don't increase. Page 8&9 of the IMP also address the fact that these uses ie. grazing are NOT transferable and dosen't include geographical (IMP I B 6(a)(b)(d) and I B 4) AZA extensions as a matter of course. In the DEIS the use of the

6-10 words 'valid existing right' 'established prior to designation' interchangebly with 'grandf thered uses' in an attempt to establish the use of an airstrip, unauthorized use of roads and vechiles on the beach, hunting by vechile in a wilderness and newly established grazing allotments as valid rights and postulates that these uses would continue at levels established prior to designation. No environmental impacts resulting from t is use are described or mitigations offered. Pg.4-1

2.) Roads and Access Corridors - Under the heading of 'activities common to all alternatives' pg.2-4 several postulates are made concerning 'recognized access corridors', vague references to their uses for hunting, vechiles and access to leasees which continues throughout the DEIS. The references to these access corridors pg. 2-4 are not specific and long term impacts are not identified. Their use open to administrative descretion with watershed considerations and analysis of need still under consideration, pg. 2-15 para 8 . Other references assume that the roads serve existing rights to hunting by vechile and access to the beach and formerly inaccessible portions of KRNCA and the beach (DEIS pgs. 1-6, 2-5&6, 3-1&4) in addition these roads are not clearly identified. As I did research on the roads situation at the Arcata and Ukiah offices, requesting a copy of the Transportation Plan (appendix H of the KRNCA plan 1974) Iwas shown a map. In order to gain understanding the nature of the existing uses and original inventory for wilderness I requested a description of the roads- once again I was refered to a map(which happened to be missing from the inventory file that refered to photo points used in the inventory). Contrary to this original inventory the DEIS states that the Smith-Etter, Telegraph Ridge and Saddle Mtn. roads would be opened under all alternatives (pgs. 2-11 ans 4-4 and 2-4para.4) Paragraph 1 page 4-2 describes recreational use and roads that were controlled privately 'until recently' ---how can this be a grandfathered use? The original inventory for CA-050-112 lists numerous roads but only six are noted as being 'on the district transportantion plan ' at the time of inventory for wilderness; and the SMITH-ETTER is NOT one of them. The files also show a record of an IMP violation in Oct. '84 for grading... where is the written rationale and env.

6-11

3.) Soils and watershed including roads use and rehabilitation All references to the KRNCA, including the FEIS, URA and MFP for the 1974 plan, cite accelerated erosional forces of the past 30 years to be 76-80 % caused by mans activities- especially road building, logging and overgrazing, and burning pg. 3-8 para. 1-4 in direct contradiction to the figure in para. 4 that approximately80% is natural.

In addition these same references attributed the decline in the King and Silver Salmon runs of the Mattole to the sediment build up resulting from these activities. Activity plans for critical watersheds in zones 5-6-7 prohibited all road construction and soil disturbing activities. The MFP in 1973 claimed that 50% of the erosion in zone 7 was from access roads In order to reach the objective of maintaining beach and marine habitat the base documents call for closure of Smith-Etter to 4miles, Spanish Ridge to a mile foottrail to the beach among others. This may have been triggered by concern over one dead sea lion carcass being found 'every mile ' ...'some with evident bullet holes' also on pg.102 of 1974 FEIS . The 1974 FEIS also states on pg. 108 to 123 that significant impacts to resources , disturbance to wildlife, brush conversion in zone 6 with erosional rates as high as 90% man induced 'is not economically feasible'. Pages 98-99 refer to 'road construction by opening up previously inaccessible areas of the KRNCA may adversely effect the animals" and that "the effect of increased recreation... potentially significant impacts upon raptors, mountain lion, bald eagle, which need isolation ". The FEIS also states that due to the increased use anticipated under the 1974 plan, an 'evaluation of increased recreational use during the first five years' would be comoleted.

3.) soils and watershed(continued) References in the DEIS as to where, howand when rehabilitation of certians roads would occur, is vague (pgs. 1-7, 2-3, conflict about mechanized rehab work). References to erosion and roads is only made briefly on Pgs. 3-8, 4-2,4,6 with even a statement that 'disturbances luckly heal' even though other sources state that bedrock would be reached eventually in some lanslide and unstable areas. The FEIS in 1974 described three stages of removing vegetation (which 'prevents erosion'- on the rugged hillsides of KRNCA) logging, evidence of increased sedimentation due to road building on grasslans along Northern boundary and conversion to grasslands, removing deep rooted plants and lowering soil stability.

4.) Grazing even though grazing is allowed in wilderness the issue here is to what degree and use? As with other resource management categories BLM doesn't seem to have a Rangeland Management Plan (pg. 2-2 para. 8 only lists 43 (FR-4100)) and since the majority of the land under grazing now was acquired after the 1974 FEIS where is the written consideration of environmental impacts and rationale supporting "grandfathered usage"; if only small portions of zone 6, 2 and 1 were being used for livestock forage then. References to the issue of grazing in the 1985 DEIS don't clarify these questions. Page 1-6 lists four leases while page 2-12 lists five as occuring within the WSA's how many acres in all are under lease ? Has there been any consideration of the effects the associated 'developments' like fences and spring developments listed on pgs. 2-7 and 2-12, will have on wilderness experi-

4.) Grazing(continued) predator control

experience to the 75% of the visitors to the King Range? What does the statement on page 3-12/(para.5) refer to concerning authorization and non-impairment; in my request for information I saw only the allotment programs? Likewise there are numerous references to predator control and the use of any means necessary to reasonably control them (pgs. 1-6&2 2-6,11,15 2-3 para.2; 3-12; 4-4,5 shouldn't this also be reviewed inthe context of which are really valid rights and how to manage the grazing without impairment to thewilderness?

5.) Land Acquisitions : The power of eminent domain given to BLM through the King Range Act in order to be able to manage the KRNCA "all but ensures that a King Range wilderness would be manageable" pg2-15 para1. and pg 2-5 para 4. In sharp contrast is the statement that "While recent acquisitions have made more land available for hunting purposes" pg3-4 para5. Similar references are made to rights to use of (via hunting, recreation, grazing) this acquired land on pgs. 2-4 para.5 and 2-6 para.2.

6.)The evaluation of timber and mineral potential is listed as being low yet the areas identified as have even this minimal potential are left out of BLM and DAC recommendations.

a.) TIMBER- Pages 4-5,6 and 4-7 describe timber potential. The damage to wildlife caused by even select cutting of Honeydew Creek and old-growth in zone 6 is understated on page 4-4 para. 2 and 4. The DEIS does state correctly that " the timber is negligible to the local economy" from a harvest on the east slope. Indeed we should restore

6.0 (a) Timber (continued)

the private lands to all age forestry practices to ensure a future supply. Why then with the outstanding value that these remaining old-growth forests provide as habitat to raptors, old-growth dependant species and spotted owl should any timber harvesting continue? The BLM should scrap the Forestry in BYU 8 in favor of reforestation and rehabilitation projects. This approach is in line with the original intent of the Act and wilderness preservation. No determination can be made until an 'operations inventory' is completed (pg. 4-3 DEIS) and if this wilderness study is the final opportunity for comment on the direction your timber development takes, once again the public has had to make comments without adequate information ? On the ground activities conflict with the intention of the memoranda to withdrawl zone 7 raptor habitat from production ... Why did BLM spend 40,000 dollars to fix a slide on a road that ends 1½ miles past the lightening trail head in Honeydew Creek? and why does the "Proposed Activity Plan #CA-056-WAP-1" list the Smith-Etter and King Range Rd. as " needed for all aspects of forest management" pg 12 para 6 goes on " Route analysis, done by the forestry staff to determine preferred haul routes for timber harvesting will provide information on roads..."

b.) Minerals The same lack of clarity about valid rights to mining claims is evident in the DEIS. Potential is low although it states there is a possibility of the development of 'nuisance' and Precise Mtn. would be withdrawn and closed to leasing if it were designated wilderness as would zones 1 and 2 in King Range (pg 4-7 para2; 4-4para6; 3-11 pg. 2-2

b.) minerals and energy-(continued)

paragraph 2&3) Once again as in the grazing uses it is not clear as to which date a claim is made valid- this is significant because the mining can only continue to the use and degree established prior to the date. Cumulative impacts of mining and extraction of oil/gas energy resources is NOT discussed because of negligible ammounts pg. 4-6 para. 3. It is difficult to accept these statements considering the general LACK of data. The Mineral and Resource Potential of the King Range and Chemise Mtn. ISA's which was exerpted on page 3-11 says that 'the full extent' of the manganese deposit which strikes toward Chemise Mtn is 'unknown' and also describes the mineralized vien heading N.E. of sea cliff at Pt. Delgada as significant which may extend into the King Range. Page 10 of the same document says oil development is not promising " using conventional techniques". This study was done in 1980- did it include a projection of increased pressures on developing domestic supplies? Consider just one of these minerals- Manganese : is an 'endangered' mineral according to the 1981 Costeau Almanc pg. 158, one on a list in the most danger of being delepted. It is a strategic mineral subsidized by the government. The U.S. imported 98% of their manganese in 1976 according to the DOI; the main sources of this mineral are South Africa and South America. The Almanac predicts the year 2000 for exhausting reserves.

The DEIS does not describe a worst case scenerio on the impacts to wilderness, watershed and environment if this mining were to occur. Even as low as the potential is

6-12 proported to be Chemise Mtn. and Horse Mtn.south of Gitchell Creek was excluidl from wilderness recommendation by BLM

b.) Minerals and energy

6-13 What has prompted BLM to put up gates aroud the Queens Peak mine and why is the road being improved? Although ouside the WSA portions of this area may still be included in a Congressional Designation. Please provide me with more information of all aspects of mining in the KRNCA, including existing regulations and status of claims in KRNCA.

7.) ORV use Chapter I B(10) and Chp. III A of the Interim Management Policy developed in 1979 directs BLM to monitor ORV use to avoid degradation or impairment of wilderness suitability and restricts motorized vechile use to open areas designated prior to FLMPA. What is the King Range status if the transportation/recreation/ ORV plan is not described in the DEIS (except on a map) and is in the process of being revised NOW prioir to designation as wilderness without public hearings and review ? If this study is to suffice the information is not in the DEIS rather the DEIS reader is refered to the FEIS on the 1974 Plan, which lists severe impacts to opening the area to intensive resource use pg 29; and the alternate B(1)pg 129- 130.

DEIS ---Pages 2-4 para. 1,5&6 vague references to vechile recreation

Pages 2-5,6,11,12,15 in dealing with the issue of ORV 's avoid the beach use and issue of controling access by way of boundaries and 'rights-of-way' and 'existing authorized' use pg 3-1para6. Page 3-4 para 4&5 fail to address the difficult nature of enforcement of the three mile limit along this portion of beach.

8.) Misc.

a.) Habitat Manipulation - the references to this activity

8.) a. Habitat

In the DEISon page 1-7, 2-2para9&10, 2-3 6&7 seem to be in conflict. The watershed plans are for for reduction of erosion many base documents suggest no soil disturbing activities (as reference earlier the FEIS pg59 is a good example). How can prescriptive burns and habitat manipulation by chemicalor mechanical means meet these objectives or those of a wilderness area? How would you assure public users that these chemicals are not entering their water?

b. How can Commercial activities be allowed for any purpose when it is in violation of the Wilderness Act? Is this evaluated in terms of impacts- such as acamping area and parking lot at Spanish Flat? pg 2-2 DEIS

9.) Cultural resources The description of these resources in the DEIS is exciting.I am concerned about a few things.

a.) On page 4-2 of the DEIS There is no description of measures to keep ORV's from desecrating these sites.

6-14 b.) Why is BLM excavating these areas when wilderness designation with no ORV/vechile recreation would serve as protection? Are some site being dug now because of ORV violations or is it really only the ones facing erosion? Is this in keeping with the Anti uities Act as stated on pg. 2-1 of the DEIS?

c.) the fencing that BLM placed around the shell mounds in the Northern end of the beach is not enhancing the wild values of that beach.

10.) There is no indication that there will be final public

6-15 hearing or review of the FEIS and wilderness Study Report in the DEIS on pg. 1-5 para.3. Will there be further review by the public and if this is an amendment to the MFP for the KING Range will the management

10.)(continued)
trends that have surfaced in this study become the base for planning for wilderness and for non-designated zones ? If it is being study concurrently with the planning level wouldn't this result?

11.) The Management Plan adopted in Sept. 1974 was from all indications in the FEIS, to be updated in five years; the update was to include environmental analysis and inventories, unless a Coordinated Activity Plan exists or individual Resource Management Plans are being developed for activities in the KRNCA ---the environmental rationale's and information are out-of-date or non-existent.

12.) The work and proposed by-pass for the Smith-Etter access appear to be in violation of the IMP chpt. I B (2a) definition of 'temporary'. It use is in violation of Cpt. I B (9) 'motor vechiles may be driven on existing access routes without grading or blading' and this is reinforced by a record of violation in Oct 1984 by Lawarence. Has this action been considered in light of CUMULATIVE IMPACTS IMP chpt,I B(2) &(4) &(5) and sec. C or under guidelines for specific activities Chpt. III A(3) pgs 16-11 -17 of the 1979 publication; which describes recreational use and access " BLM will analyze the magnitude of all proposed activities to ensure recreational use will not cause impacts".

13) The vrm classification should remain at classI for all areas of the KIng Range and for Chemise Mtn. it should be made a wilderness and the class changed to VRM-classI. If you are not recommending Chemise Mtn. based on the visible detractions of the residential community and these have occurred since the wilderness inventory - even within the WSA-aren't there any regulations under IMP that could deal with these detractions. Certianly the sounds

COMMENT LETTER 7

Lost Coast League
Box 171
Honeydew, Ca. 95545

Mr. Van Manning, District Manager
Bureau of Land Management
P.O. Box 940
Ukiah, Ca. 95482 7/1/85

Dear Mr. Manning:

Attached please find the original copy of the Lost Coast League's comments on the DEIS on the Preliminary Wilderness Recommendations For the King Range WSA and Chemise Mountain WSA.

If you have any questions regarding these comments, please contact either Carl A. Zichella, or Cecilia Gregori at the following numbers:

Carl A. Zichella-- 445-0881 (wk.)

Cecilia Gregori-- 986-7787

Written questions can be directed to either: 736 Patrick Court, Arcata, Ca. 95521, or Box 171, Honeydew, Ca. 95545.

Thank you for your consideration in this matter.

Sincerely yours,

Carl A. Zichella
for the Lost Coast League

LOST COAST LEAGUE

COMMENTS ON THE PRELIMINARY WILDERNESS RECOMMENDATION FOR THE ARCATA RESOURCE AREA

**AS PREPARED BY THE U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
UKIAH DISTRICT OFFICE
FOR
CHEMISE MOUNTAIN WSA AND KING RANGE WSA**

INTRODUCTION

The King Range National Conservation Area (KRNCA) has long been recognized for its isolation and scenic splendor. Among coastal areas of the United States, the KRNCA is unique. Outside of Alaska, there is no other roadless coastal Wilderness with the dramatic mountainous topography found in the KRNCA. For this reason, Congress created the KRNCA as the nation's first National Conservation Area, and endowed the agency charged with its stewardship the power of eminent domain. It is the only federal holding so protected. Clearly, the intent of Congress was that, while managing the area for multiple use, maximum consideration for Wilderness designation should be afforded the KRNCA, through a careful and complete Wilderness Study process. Resource conflicts would be addressed throughout this process, during which no actions could be taken which would render as unsuitable for Wilderness any areas within the KRNCA.

DEIS: BASIC CRITICISM

Scoping

The Draft Environmental Impact Statement (DEIS) under consideration here dismally fails to meet the intention of Congress. The document fails to meet minmum standards of completeness when scrutinized on its merits, or lack thereof. The scoping for the DEIS was inadequately performed, with concerns in favor of expanded Wilderness designation given only cursory attention, if not ignored outright. Such issues as the negative impacts of overgrazing and off road vehicle (ORV) use on the beach, as well as the beneficial effect of Wilderness designation on fisheries habitat protection and restoration were not addressed seriously in the DEIS. They are serious concerns specifically mentioned by interested parties, and deserved more complete attention in the DIES. Instead of considering all of the issues raised by the public, the DEIS catalogued primarily those concerns raised which were antogonistic to Wilderness. Of the eight concerns mentioned in the DEIS, only one was a concern that favored Wilderness designation of KRNCA lands.

7-1

Ommissions and Judgement

Other weaknesses abound. Sections cataloguing the flora and fauna of the WSAs are so deficient and incomplete as to be virtually useless. BLM should be embarrassed by their ommission. The public is ill-served by such breakdowns of responsibility within an agency entrusted with the protection and future management of such a pristine resource. Questionable judgement has been used by BLM in defining the borders of their proposed alternatives as well. Chemise Mountain falls only 700 acres short of the BLM imposed minimum of 5000 acres. The East Slope of the Kings Crest is excluded as not "unique" enough-- a dubious rationale at best. This particular exclusion, however, places the only water sources for backcountry recreation outside the Wilderness. Extremely valuable habitat for rare and endangered raptor species would also be placed beyond the Wilderness boundary by BLM. Not addressed in the DEIS are the impacts of BLM activities which could prejudice the designation of certain portions of the KRNCA.

7-2

7-3

Activities Potentially Prejudicing Wilderness Designation

Activities initiated by BLM, such as improvement of the Smith-Etter "road" and its opening to non-traditional uses (such as unlimited public access), appear to have been timed and implemented in such a way as to lend credence to the boundaries that they are proposing.

Smith-Etter "road":

In keeping with the spirit of the intent of Congress in establishing the KRNCA, and also in keeping with the spirit of recent research carried out by BLM, and strong citizen input regarding future management of the region, it is absolutely clear that the Smith-Etter "road" is, over the long term, both a blight and a source for continuous management error. Its existence as such should be eliminated as soon as possible, and under no circumstances should it, in its present condition, be excluded from Wilderness consideration or dictate the location of any boundaries. The

Smith-Etter"road"is a low-standard access way for private inholdings, and in the opinion of BLM resouce manager John Lloyd, fully qualifies for inclusion under any Wilderness Alternative. To underscore this point, BLM claims their recent upgrading of the "road" is an attempt to prevent erosion, not make the "road" a more significant feature. In fact, many such "improvements" or repairs are being made on the section of "road" BLM itself is recommending for Wilderness. While BLM is to be commended for retiring many old spur roads and jeep tracks within the KRNCA, we view with great alarm BLM's upgrading, and simultaneous opening of the Smith-Etter "road" to non-traditional, unrestricted access. When the time comes to downgrade the "road" to trail status, we would urge BLM to call upon the resources and expertise of Redwood National Park which is pioneering much work of this sort at the moment.

SPECIFIC CRITICISMS:
Alternatives

The various proposed Wilderness alternatives presented all have weaknesses, but we will confine our remarks to BLM's favored alternative for the King Range and Chemise Mountain WSAs. BLM has offered no reasonable explanation for any deletions of areas inside the WSAs, or those which fall beyond WSA boundaries. The boundaries have been described by BLM staff as "arbitrary," and the result of political pressure, both from the administration, and from wealthy landowners whose property lies adjacent to the KRNCA. One such landowner, Joe Russ, who in fact was a seated member of the District Advisory Council's Technical Review Team, (perhaps a conflict of interest) was quoted as remarking to a BLM official: "we don't want them (Wilderness Advocates and members of the public) over the ridge (from Honeydew Creek watershed)."

The fact that this sort of political pressure has substituted for the evaluation of public lands by their own considerable merit is an outrage. The areas in question, in BLM's " Zone 7" (sections 13-17, 24-20, 25, 26, and 31) have outstanding Wilderness qualities, and certainly qualify for Wilderness designation under any standard of measure. This region,

7-4 encompassing the Honeydew Creek/Upper Squaw Creek watersheds and Telegraph Peak portions of the WSA have documented Spotted Owl and seasonal Bald Eagle nest sites. In addition, it meets the criteria for inclusion as suitable Wilderness in the BLM's Wilderness proposal.

There is also no valid justification for the "No Action" Alternative chosen by BLM for the Chemise Mountain WSA. This WSA affords one of the most dramatic scenic opportunities in North America. While it is under 5000 acres insize, there is no provision in the Act that disqualifies areas under 5000 acres. On the contrary, the inverse is true: the Wilderness Act and recent federal court precedent clearly demonstrate small area eligibility. As the Wilderness Act states, in Section 2 c.:

> "A Wilderness... (3) has at least 5000 acres of land *or is sufficient size as to make practicable its preservation and use in an unimpaired condition.*"

7-5 Clearly Chemise mountain fits this definition most aptly, and deserves Wilderness designation. Further, we vigorously contest the BLM rationale that," the sights and sounds of private lands to the East significantly impact the feeling of solitude... ." We believe that the sights and sounds BLM refers to are extremely minimal, and might easily be overlooked by the Wilderness visitor. In addition, it is far from the sort of impact that is endured in some other Wilderness areas in the NWPS. We feel that these sight and sound "intrusions," minimal as they are, actually enhance the Wilderness sense of solitude and provide a heightened experience of the truly Wild nature of the Chemise mountain environment, by underscoring Man's fragile relationship with nature. Congressional guidance on such matters is clear. Federal agencies, in fact, were cautioned in 1978 from placing too much weight on the sight and sound impact evaluation in Wilderness Studies. In the case of the Sandia Mountain Wilderness in New Mexico, the House Report (No. 95-540) stated:

> The "sights and sounds" of nearby

> **Albequerque, formerly considered a bar to Wilderness designation by the Forest Service, should, on the contrary, heighten the public awareness and appreciation of the area's outstanding Wilderness values.**

We believe that this is precisely the same situation we are faced with at the Chemise Mountain WSA, except the impacts of sights and sounds referred to by BLM at Chemise Mountain are far less than those mentioned in the House Report referenced above.

While the abovementioned example was a case involving the U.S. Forest Service, it is a valid precedent for BLM. BLM's Wilderness Study Policy, Standard No. 6, directs the agency to consider the "extent to which the recommendation is consistent with officiall approved and adopted resource-related plans of other Federal agencies, State and local governments and Indian tribes, ...as required by FLPMA and the BLM planning regulations."

Finally we believe the whole issue of 5000 acres or less is rendered moot by the existence of the Sinkyone Wilderness, a State-managed Wilderness which is adjacent to and contiguous with Chemise Mountain. Thus, Chemise Mountain should never be considered by itself anyway, rather it is an extension of the Sinkyone Wilderness resource representing more than 40 miles of roadless coast.

SUITABILITY OF DELETED AREAS

The Lost Coast League contends that the KRNCA boundary should be utilized as a baseline with which to define the final Wilderness (excepting obviously heavily developed parcels such as Shelter Cove, Whale Gulch, and the major roads leading to them). The remainder of the KRNCA deserves consideration (study). As of this moment, we do not feel that the WSA boundaries represent all Wilderness qualifying lands present in the KRNCA. Some areas we feel are deserving of consideration, such as the Big

Finley area, in which there have been documented raptor nest sites, are not included within WSA boundaries; we feel they should be. Therefore, our proposal would more completely satisfy the Congressional intent that all Wilderness qualifying lands receive consideration for legislative protection. We are most willing to participate in and contribute to any field surveys neccessary to distinguish lands which do not qualify from those which do. However, we cannot accept the status-quo-- that only lands in the pesently defined WSAs qualify for Wilderness designation under FLPMA, and the Wilderness Act of 1964.

7-6 Our analysis of the lands within the WSAs, but omitted from BLM's recommended Alternative, similarly indicates that qualifying areas were deleted without good cause. These lands, including the Honeydew Creek Watershed, upper Squaw Creek watershed, Telegraph Peak, and the remainder of the east slope, meet the criteria for Wilderness designation set forth in FLPMA and the Wilderness Act of 1964. The abovementioned areas contain nest sites of the endangered Spotted owl, and seasonal nesting sites for Bald Eagles. In deleting the above areas, BLM has failed to acknowledge a raptor study the agency itself has completed. Such an ommission is a serious error; it could convey the impression that logging activities would be as valuable or more valuable than habitat preservation, by drastically understating the value of the habitat. This is particularly important given the fact that the greatest stands of old-growth timber exist in these areas. This old-growth provides excellent habitat for these raptors. The most logical use of this particular area is as Wilderness-- to leave undisturbed from development "pockets" of primal habitat essential to the survival of these legislatively protected species. In addition, these are among the last remaining portions of the old-growth that once dominated this region.

The BLM deleted lands, in addition to the habitat preservation values mentioned above, has importance as a sort of "living natural history museum" of the original ecological character of northern coastal California. Surrounding areas to the King Range have been so abused and denuded by past timber and grazing practices that these "pockets" represent the last enclaves of such undisturbed land to be found along the coast. They are made even more unique by the realization that there was historically very

little Douglas Fir forest west of the so-called "Redwood Belt." Thus, the King Range old-growth was unusual before the swing of destructive development of coastal forests began. It is ever the more valuable for this today, and should be preserved for future generations. This concept has been noted and supported in BLM's own policy document: Wilderness Study Policy: Policies, Criteria and Guidelines for Conducting Wilderness Studies on Public Lands, **Federal Register**, February 3, 1982. Under the section, *Component No. 3: Multiple Resource Benefits: The Benefits to Other Multiple Resource Values and Uses Which Wilderness Designation Could Ensure* it is stated

> **The BLM wilderness program policy recognizes the ability to ensure multiple resource benefits in these words:**
>
> **In addition to its value as a setting for primitive recreation and solitude, wilderness can also provide a range of benefits to other multiple resource values and uses which are of significance to the American people.**
>
> **These may include protection of watersheds, water yields, and water quality; protection of wildlife habitat; preservation of natural plant communities...**

Furthermore, BLM Wilderness Study Policy directs the agency to consider "Special Features-- Quality of the Area's Optional Wilderness Characteristics." Such features include those of "scientific, educational scenic or historical value." As the last areas of their kind, the deleted areas in the King Range WSA, and the Chemise Mountain WSA, qualify under all of the above standards of measure. As the Wilderness Act states:

> **...Wilderness areas shall be devoted to the public purpose of recreation, scenic, scientific, educational conservation and historical use. (section 4 b.)**

Unquestionably, the deleted King Range areas and the Chemise Mountain WSA are of important historical and scientific significance. With the areas contained inside the WSAs, they represent a window to the past-- to the aboriginal life patterns of those who preceeded us on North America as well as to the natural environment that has, in such a tragically short time, been all but totally erased by the exploitationist practices of the twentieth century. The loss of such places is an irreversable mistake we cannot allow to occur.

OTHER CRITICISMS

Archaeological sites and Wilderness protection

There are numerous documented archaeological sites in the King Range that would benefit from Wilderness designation. These sites are high quality middens that present a rare glimpse of the lifestyle, hunting and trading patterns of the Sinkyone Indians. Vehicle access to the beach has already threatened these sites, due to BLM's inability to enforce vehicle restrictions currently in place. Only Wilderness designation coupled with a vigorous enforcement policy will ensure that these site are available for continued rersearch. This represents an important Optional Wilderness Characteristic that BLM has not considered fully in the DEIS. Vehicle beach access provisions in BLM's plan threaten these educationally, scientifically, and historically valuable parts of the KRNCA wilderness (These sites lie within all the Alternatives for the King Range WSA.).

Plant and wildlife inventories incomplete

BLM acknowledges that inventory studies of the flora and fauna of both WSAs and areas outside WSAs in the KRNCA are incomplete. BLM has not utilized data at its disposal in performing its analysis for the DEIS;

in particular, one raptor study completed in the Honeydew Creek area has been totally disregarded. Studies done by graduate students at Humboldt State University (HSU) of the flora of the Chemise Mountain WSA have not been accessed. One such study, by botany graduate student Ken Clark, found some 70 species of native plants BLM has neglected to list in the DEIS, some of which are candidates for the Endangered Species List.
7-8 BLM's list of vegetation to be found at Chemise Mountain contains only nine specifically mentioned species. Such a massive omission is hard to believe. It seems a simple matter (there is a BLM office in Arcata, where HSU is located) for BLM to have contacted the excellent and widely recognized Natural Resources and Forestry Departments of HSU for information on graduate work in the field, either completed or in progress. Had BLM done so, it would have come across Mr. Clark's work. Despite the pressure of a low budget, which BLM has blamed this inadequacy on, a phone call and access to graduate work would not have broken the bank. It seems reasonable to expect at least this level of effort from a federal agency making recommendations on the future of such a unique area as the KRNCA. Sadly, BLM has not provided it.

Wilderness designation and its effect on fisheries

7-9 As noted in the discussion on scoping (p. 2), there is an inadequate treatment of the beneficial impact Wilderness designation would have on the fisheries resource. Wilderness designation would preclude logging on the steep slopes of the King Rang and prevent the damaging erosion and siltation that has threatened the very survival of northern California's anadromous fish resource. In addition, designation of the watersheds on the East slope of the King Range would protect and preserve spawning habitat in the entire Mattole system. As noted, these areas are absent from BLM's proposal. Their inclusion in a KRNCA Wilderness is consistent with BLM Wilderness Study Criteria, Component No. 3, and House Report 94-1163 which directs agencies to consider that:

> **In addition to public use values, ultimate designation as wilderness should augment multiple, use management of adjacent or nearby**

> **lands in <u>protecting watershed and water yield,wildlife habitat preservation,</u>preserving natural plant communities and similar natural values.** ***emphasis added***

We defer to other organizations, such as the Mattole Restoration Council for a more in-depth treatment of the Wilderness benefits to the fisheries resource, and the effort to preserve habitat for anadromous fish. BLM has failed to consider the above points adequately in formulating their recommendation.

CONCLUDING CRITICISMS AND COMMENTS

7-10 Frankly, we, and much of the interested public have been dealt a very elusive and incomplete DEIS to comment upon. It is particularly unbelievable that whole alternatives are presented with essentially nothing in the way of rationale for the specific boundary locations. By this we mean there should have been substantial references to the resource values included within a boundary and the short term justifications for excluding various watersheds for each alternative.

If BLM had properly performed these tasks for each alternative, the public would have had an easier time evaluating the agency's bias or perspective. As it is, we really have no idea at all <u>why</u> upper Squaw Creek or Honeydew Creek, for example, are eliminated from all alternatives except the obvious All Wilderness version.

Chapter 4, <u>Environmental Consequences,</u> only haphazardly answers some of the mystery questions by listing various types of "resources" such as wildlife, Timber, etc., and noting only if options for "playing around" (ie. logging etc.) with them are "prohibited" or "not impacted" by each alternative.

Clearly, however, BLM has the capability to be more site specific (at least to each sizable watershed) when discussing each alternative and its rationale for locating the boundary in each. This feature of avoiding discussion of the reasons behind the decisions is the most serious fault of the DEIS. The document is noteworthy as much for what it does <u>not</u> say as for what it does.

BLM is to be commended for openly admitting at times a lack of data with which to pass judgements. An example is the discussion in 4-3 of the timber resources of Honeydew Creek as it applies to Wildlife Management.

> **Actually, this loss of timber production because of Wilderness designation may be significantly overstated. Wildlife inventories for Honeydew Creek, as required by the King Range Management Program, have not yet established wildlife use. If it is finally determined that timber production should be curtailed in the Honeydew Creek drainage to enhance wildlife, then some loss of volume will occur regardless of wilderness status.**

Then BLM goes on to admit any logging at all may remain substantially open to question:

> **Also, an operations inventory is required to determine exactly how much of zones 6 and 7 can be economically logged, and this has not been done. Some loss of volume and acreage may result from such an inventory.**

How then, given these sorts of admissions, does BLM justify such a total exclusion of the eastern side of the King Crest from any of its developed alternatives, especially the favored alternative? The answer is not to be directly found in this DEIS, but neither are we stupid. An inescapable conclusion continually emerges that once again an agency is ignoring an overwhelming expression of the public interest and opting to hold out as much of the King Range for special interests as it can.

Because BLM cannot justify its proposed Partial Wilderness alternative any more than it can really demote the All-Wilderness alternative, it has chosen to say *much* about *nothing* in particular.

One can view the document as one huge Omission. Political considerations and pressure from weathy private landowners seem to have been given disproportionate weight over the merits of the areas in question. This is an unlawful execution of both the letter and the intent of Congress regarding the KRNCA. It is totally unacceptable. The Draft Environmental Statement must remain a draft, and be reissued with amending text considering the full range of impacts at issue on all portions of the KRNCA suitable for Wilderness designation, whether presently in WSAs or not. 7-11

COMMENT LETTER 8

Mr. Van Manning

Bureau of Land Management
P.O. Box 940
Ukiah, CA 95482

Dear Mr. Manning;

On behalf of the Mattole Valley Community Center, I am writing to you to express our dissatisfaction with the recently released Draft Environmental Impact Statement for the King Range Area.

8-1 Among our concerns over the E.I.S. are the omissions of zones six and seven as classified wilderness areas. The B.L.M., along with state and private efforts, has helped restore these essential areas with watershed rehabilitation and salmon enhancement programs. A 1981 B.L.M. Survey pointed out these areas as critical to the breeding of endangered species such as the spotted owl and goshawk. This Environmental Impact Statement, however, chooses to ignore these facts.

The Mattole Valley Community Center believes the Draft Environmental Impact Statement is in drastic need of revision. We see no valid reasons for zones six and seven to be excluded from wilderness classification.

We urge you to enlarge the wilderness areas to include zones six and seven.

Sincereley,

Bett Pinkerton

Bett Pinkerton
Mattole Valley Community Center

c.c. Rep. Doug Bosco
Sen. Alan Cranston
Sen. Pete Wilson

COMMENT LETTER 9

Society for the Protection of Nature in Israel

Van Manning
Ukiah District Manager
Bureau of Land Management
P.O. Box 940
Ukiah, Ca. 95482

25 June, 1985

Dear Mr. Manning,

Many members of our California, Oregon, and Nevada Chapters have taken trips to the "Lost Coast" of California (Kings Range National Conservation Area).

NO OTHER REGION IN WESTERN STATES CAN OFFER THE ISOLATION, WILDERNESS BEAUTY, AND WILDERNESS RECREATION POTENTIAL OF THIS AREA. THEREFORE, I STRONGLY URGE YOU TO GIVE OFFICIAL WILDERNESS DESIGNATION TO THE ENTIRE KINGS RANGE NATIONAL CONSERVATION AREA, CHEMISE MOUNTAIN WILDERNESS STUDY AREA, MATTOLE RIVER DRAINAGE, AND OTHER CONTIGUOUS WILDERNESS AREAS.

I have personally visited Sinkyone and consider it one of the most beautiful and environmentally interesting area in the State. It offers a true wilderness experience to our members, and to all Americans, and should be protected as such.

Very truly yours,

Daniel Meyerowitz

Daniel Meyerowitz
United States Representative

DANIEL MEYEROWITZ • American Representative • 2911 Euclid • Berkeley, CA 94705 • (415) 849-2138
4 Mapatel's Street • Tel Aviv, Israel 61 183

COMMENT LETTER 10

THE WILDERNESS SOCIETY

CALIFORNIA/NEVADA REGION

May 10, 1985

Mr. Van W. Manning
District Manager
Bureau of Land Management
Box 940
Ukiah, CA 95482

Dear Mr. Manning:

We appreciate the opportunity to comment on the Draft Environmental Impact Statement on the King Range, or the "Lost Coast," as it is so aptly named. No one could look on this rugged, wild coastline and deny that it is true wilderness. BLM itself states that the King Range is an "area long recognized as one of the most unique and scenic stretches of California coastline." Its unique mixture of terrestrial and marine habitat is home to a great number of birds and wildlife. Its pristine condition and breathtaking vistas provide an opportunity for contemplation, wonder, and a window into a more primitive time. 10-2

We are therefore both surprised at and disappointed with BLM's recommendation. BLM has appeared to have turned the King Range into a patchwork quilt; everybody has their own special piece to use as they wish. This area, possibly more than any other area in the state, merits wilderness designation. There should be no doubt, no argument, no debate. It is truly a shame that such a glorious opportunity to add to our nation's trove of natural resource treasures should be missed. 10-3

Specifically, we feel the Mattole River area should be included in an all-wilderness alternative. The dune system "is of high ecological significance," and the river itself is the inland terminus for nine tributary streams offering good salmonid habitat. The intertidal zone between Mattole and Whale Gulch has been designated an Area of Special Biological Significance. This fragile and valuable 10-1

ecosystem should also be protected as wilderness. We would also like to know if this region was omitted from wilderness consideration because of split estate mineral rights. If so, what does BLM plan to do now that Justice Karleton has ruled that all split estate acres in WSAs must be reinstated? The failure to consider these areas, and the omission of any reference to the contiguous Sinkione Wilderness State Park, certainly appears to be grounds for a supplemental DEIS.

BLM's proposed alternative excludes 600 acres of Douglas Fir stands in Honeydew Creek. These old growth trees are home for the threatened spotted owl. Additionally, both Honeydew and Bear Creeks contain numerous steelhead juveniles during the summer months.

BLM's alternative would also allow logging and road construction which would have a severe adverse impact on wildlife, soils, watershed and vegetation. The King Range already has the dubious honor of having the highest natural rates of soil erosion and sediment yield in the United States. Human activities, such as logging, road building, grazing and burning, exacerbate an already tenuous situation.

The Environmental Consequences section is highly inadequate. Under each alternative BLM "assumes" that managing Zones 1 and 2 for recreation is the same as protecting them as wilderness. Thus the effects of non-suitable designation under alternatives III, IV, and V, such as potential road construction and mineral activities, are ignored.

Furthermore, environmental consequences should be dealt with alternative by alternative. We find no impacts of non-wilderness designation on cultural resources, visual resources, vegetation, or wildlife. What are the effects of continued vehicle use in Zones 6 and 7? What are the impacts of use on the recently opened Smith-Etter Road?

The Wilderness Society strongly objects to any methods of predator control that would conflict with the guidelines set in the Wilderness Management Policy. We also object to the 10-4

continued vehicle access guaranteed in every alternative. Access to a private home is one thing and correct under the law; open and uncontrolled vehicle access to the public is quite a different issue.

10-5 We would also like some clarification on the issue of grazing. It is our understanding that BLM never had a grazing plan for the King Range. Under what authority will grazing allotments be assigned? Furthermore, we have found two different AUM figures cited: 1222 in the King Range Management Plan, and 3300 in the DEIS.

10-6 The Wilderness Society also finds difficulty with the statement on page 4-1: "designation would probably add a minor degree of legislative protection...and may provoke additional public interest to better patrol the area and enforce vehicle enclosures." First of all, what exactly are "vehicle enclosures?" Secondly, aren't patrol and enforcement already BLM's responsibility, with or without public support??

BLM's recommendation for Chemise Mountain is totally unacceptable. The designation "primitive area" is defined under CFR 43, Subchapter B, subpart 2071.1. However, it is stated under subpart 2071.4 that "designation under this section will have no effect upon established use or management of the areas or sites involved." In other words, designation as a primitive area has no meaning. It can not be offered as an alternative.

10-7 Furthermore, if the intent of both alternatives is essentially the same, why not designate Chemise Mountain wilderness? BLM is ignoring the original intent of the Wilderness Act, which is permanent protection of an area against all future and unforeseen development activities. Management as a recreation area would not be permanent, nor would it protect the area against future development, such as road construction and mining activity.

The arguments presented against wilderness designation for the entire King Range and the Chemise Mountain are weak. The influence of sights and sounds, an argument used

recently by the BLM, is not a criteria for wilderness designation. Arguing that opportunities for recreation are limited because of size is inconsequential considering that the Chemise Mountain is an integral part of the entire King Range Conservation Area. Plus, it is indefensible to say that opportunities for recreation are limited, yet then turn around and propose managing an area for recreation!

10-8 Another interesting issue is the size of Chemise Mountain. A quick perusal results in four different acreage figures: 3,941 acres in the 1975 primitive area designation; 4,021 in the Final Inventory; 6,400 in the Situation Evaluation in the ISA Wilderness Report (Feb. 1980); and the current 4,300 acres presented in this DEIS.

The Chemise Mountain currently is roadless; failure to designate it as wilderness leaves it wide open for future road building. Chemise Mountain is also part of the rugged and remote Lost Coast; it would be unconscionable not to protect it forever as wilderness.

The Bureau of Land Management's recommendation for the King Range and Chemise Mountain WSAs appears to be nothing more than an effort to appease every resource user in the area. It is inconceivable that with such an example of rugged wild coastline beauty, and such an opportunity to reach a unanimous consensus on the imperative need to permanently protect it, BLM has done the job only halfway. The arguments presented and the totally inadequate environmental consequences section reaffirm the patchwork job done in this study. The Wilderness Society strongly objects to BLM's preferred alternative, and instead supports and applauds designation of the entire King Range National Conservation area as wilderness. This is the one and only path to take to insure the preservation of one of this country's prime treasures.

Sincerely,

Patricia Hedge

Patricia Hedge
Regional Director

Jeri Galbraith

Jeri Galbraith
Regional Assistant

COMMENT LETTER 11

ALAN L. BELLON

195 Calvert Court
Ukiah, Calif. 95482
707 462-8404

Registered Professional Forester - License Number 126

Van Manning, District Manager
Bureau of Land Management
P.O. Box 940
Ukiah, CA 9548

Dear Van:

I have studied the DEIS for Chemise Mountain and King Range WSA's. I recommend that part of the boundary line be changed in your proposed action for the King Range WSA and that you change your proposed action for Chemise Mountain to a recommendation for wilderness. I have outlined my reasons below.

King Range WSA: I don't disagree strongly with the basic size and location of your recommended wilderness. I question your choice of a boundary line "... 25 feet west of the centerline of the King Crest Trail ...". This location was chosen, as far as I can tell from page 2-12, second full paragraph, to allow for proper maintenance (and even to exceed 25 feet where necessary). I don't understand what kind of "proper maintenance" could be required that is not compatible with a wilderness designation. I have never heard any justification for excluding trails from wilderness areas so that they
11-1 can be maintained properly.
A better location for the boundary is one-quarter mile east of the crest of the King Range or one-quarter mile east of the centerline of the King Crest Trail, whichever is further east. The upper slopes of Honeydew Creek and the North Fork of Bear Creek that would be added to the wilderness using this boundary are much too steep and fragile for any physical management practices such as roads or logging. No management options outside the wilderness would be foreclosed by this slight enlargement of the wilderness, but the integrity of the wilderness would be improved.

Chemise Mountain WSA: I refer particularly to page 2-19 of the DEIS where you summarize your reasons for choosing the proposed action.
11-2 1) Proximity of the Shelter Cove Subdivision does not detract from an outstanding wilderness experience. Other wilderness areas have similar adjacent developments. The Yosemite wilderness is bisected by the Tioga Road, a major

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highway. Tuolumne Meadows, in summer a community much larger than Shelter Cove, is located in the heart of the wilderness. It's possible to camp six or seven miles from the road and to hear and see the cars travelling along the road day and night. Rather than detract, this tends to enhance feelings of solitude and isolation from civilization.
The road that forms part of the north boundary of the area does not detract from the feeling of solitude because no trail goes near it and no users are going to wander over to it through the dense vegetation. In fact, virtually none of the users will ever be aware the road exists.

2) More than two-thirds of the WSA is protected from sights and sounds on private lands to the east by Chamisal Mountain as well as other topographic features and the dense vegetation. In any case, the comments about Shelter Cove apply to this area also.

3) If the intent of wilderness designation is similar to primitive area designation then there seems to be no reason not to recommend wilderness, if that is the appropriate result of considering tha wilderness criteria. The main reason that wilderness designation was not recommended in 1974 when the King Range Management Plan was prepared was that BLM administered land was not eligible for such designation at that time. Now it is eligible if it meets the criteria.
The comparison of impacts in the DEIS shows virtually no difference between the two alternatives. (The difference in visual impact permitted under VRM Class II seems to be immaterial since I don't believe you intend to take advantage of the more permissive standards.) Therefore, since the impacts are essentially the same, impact analysis does not help to choose between alternatives.
The last sentence on page 2-19 of the DEIS seems to be a reason, perhaps the only one, for choosing primitive status. I interpret the words to mean that you chose primitive designation because it is more convenient for the managers, rather than because it is better for the land or for the user.

4) Dispersal of users is not necessary for someone to have a high quality wilderness experience. Almost all wilderness use takes place along trails. Few users ever get more than 100 feet or so away from trails. Along the trails they tend to congregate at relatively few desireable camp sites near water, no matter how large the wilderness area. For

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example, backpackers stream along the Pacific Crest Trail by the hundreds and are seldom out of sight of other users. They are, never-the-less, having a high quality wilderness experience.

The small size of the Chemise Mountain WSA is not as negative a factor as it might seem. The dense vegetation and steep slopes provide a strong feeling of isolation, one that is more difficult to achieve in many large but open wilderness areas. Because of the screening and sound-deadening effects of the dense vegetation trails can be located closer together than in many larger areas. Thus, Chemise Mountain can accomodate more visitors than seems likely if only the gross acreage is considered.

Another size factor that must be considered is the ocean. It acts as an enormous buffer that prevents intrusion from the west. It adds unlimited size to the scenic surroundings. In my many visits to the area I have never seen a boat nearer than Shelter Cove. The ocean is an integral part of this wilderness and it effectively increases the size of the area tremendously.

In summary, I believe the Chemise Mountain WSA meets the criteria for inclusion in the National Wilderness Preservation System. There will not be any unacceptable impacts as a result of such inclusion. The area meets the wilderness study criteria in that it has the essential wilderness qualities, adds diversity to the System and can be managed to preserve its wilderness character.

In making this recommendation I am drawing on my many visits to the area over the past thirty years as well as dozens of visits to many other designated and de facto wilderness areas. I hope my experience can be of use to you in your further consideration of the decisions you must make about these WSA's.

Sincerely

COMMENT LETTER 12

P.O. Box 700
Garberville, CA 95440
13 June 1985

District Manager
Bureau of Land Management
PO Box 940
Ukiah, CA 95482

Dear Van Manning,

I want to take this opportunity to supplement the testimony which I gave at the public hearing in Redway on May 9 regarding the Draft Environmental Impact Statement on the King Range and Chemise Mountain WSAs.

I have been familiar with the King Range for 15 years, and have explored much of the WSA by foot. There is no question in my mind about the suitability of this area for wilderness designation. The EIS generally supports this contention. The questions which remain have to do with the size of the final wilderness and the restrictions on access and vehicular use of the area.

The Draft does a satisfactory job in Chapter 3 of describing the wilderness values of the WSA. The language is certainly a bit cold, considering that what is being described is one of the most powerful meetings of land and sea on the whole Pacific Coast of the United States. But nonetheless, the basic characteristics are adequately detailed.

Where the Draft falls short is in describing the various alternative actions and their rationales. This is especially the case with the proposed action, Alternative 5.

First of all, the statement that the "undisturbed coast along the King Range is very unique" and would add diversity to the Federal Wilderness system is indeed an understatement. There is no other area within Federal ownership which constitutes such an extensive coastal wilderness. This fact applies to all the alternatives save for the no-action option. However, the draft fails to provide any serious evidence which argues for the adoption of the proposed alternative over the all wilderness alternative. In fact some of the justification is plainly erroneous. An example is on page 2-15 which proclaims:

> The area east of the ridgeline is not included in this wilderness recommendation because it is not as unique as the coastline and has large areas that have been logged and significantly impact the feeling of naturalness. Also, the roads and trails are easily recognizable boundaries on or near a topographic break.

This is the major argument for excluding the eastern slope of the

12-1 WSA from wilderness. It is a seriously flawed statement. First of all it gives no figures for the amount of acreage on the east slope which has been logged. My experience is that the amount of logging in this area is not very significant, and does not substantially detract from wilderness values. Secondly, the east slope is unique in that there is no other portion of the Federal Wilderness System which includes this kind of vegetative community. Thirdly, the Horse Mountain Road constitutes a logical and certainly recognizable wilderness boundary, even if it does not always follow the topographic break of the ridgetop.

The Draft contends that the proposed action yields a more easily managed wilderness area. However, save for fire control, there is no documentation or rationale for why the management tasks would be simplified with the proposed alternative. In short, the proposed alternative seems to be a rather arbitrary selection, or perhaps a political one as it strikes a compromise between all-wilderness and the other more limited recommendations. If there are more significant reasons for choosing the preferred alternative over the all-wilderness alternative, they have been excluded from the Draft.

Let me add at this point, that I am not amongst those who are urging the Bureau to classify the whole of the KRNCA as wilderness. This would, in my opinion, be a blatant violation of the spirit of the Wilderness Act of 1964. The whole of the KRNCA simply does not meet the criteria of the Act. This is not to say that I don't favor watershed protection for Honeydew, Bear and Squaw Creeks. I certainly feel that full protection should be afforded them, but I do not feel that it is fair to bend the concepts incorporated in the Wilderness Act in order to include these areas.

12-2 I do feel very strongly on the point of continued vehicle access via the Smith-Etter Road, and the continued use of vehicles on the beach. Both the All-wilderness alternative and the proposed action seem to include vehicle access along the beach and via the Smith-Etter Road. This is flagrant contradiction in terms and in law. The Wilderness Act very clearly specifies that motorized equipment is not appropriate to the concept of wilderness. I would hope that the final EIS corrects this serious misinterpretation of the law.

And finally, I would like to point out a remarkable error on page 4-6. In the first paragraph we find the statement:

12-3

> A "purist" could construe that the loss of wilderness values through nondesignation, because of logging or other resource extraction, is an irretrievable loss. In the King Range, however, because of the rugged topography, high natural erosion rate, and dense vegetation, such disturbances quickly heal to the point that they are virtually unnoticable.

On the contrary, it is exactly because of rugged topography and high natural erosion rates that human disturbances in the King Range tend

to have a lasting impact on the land. Case in point is the Horse Ridge Road, the scar from which will last for several generations, though I grant that it will ultimately disappear if the road were ever abandoned.

12-4 In concluding, I would like to stress my support for the All-Wilderness Alternative. The Draft EIS makes as good a case for this action as for the preferred alternative. A final EIS should more adequately address the impacts of vehicles in or around the wilderness, the impacts of continued grazing, and the impacts of abandoning existing roadways and ways without "putting them to bed."

Sincerely,

Douglas Fir

3

COMMENT LETTER 13

May 24, 1985

Van Manning, District Manager
Bureau of Land Management
P.O. Box 940
Ukiah, California 95482

Dear Mr. Manning:

13-1 We enjoy hiking in The King Range National Conservation Area, and are very concerned that your Draft Environmental Impact Statement fails to recommend wilderness protection for the entire 50,000 acres. In our view, The KRNCA qualifies for wilderness protection, and any existing human impacts will quickly go natural if protected. All roads into the area should be closed. The Smith-Etter Road should be used only for legal access to private inholdings. It's absurd that the King Range and Chemiss Mountain are considered as separate Wilderness Study Areas. Together, they form a contiguous "Lost Coast" which includes The Sinkyone Wilderness.

Because of its unique status as the last unroaded stretch of coast in California, its valuable habitats for endangered species and declining anadramous fish, and its archaeological importance, the KRNCA is a prime candidate for wilderness protection. The National Wilderness Preservation system has no other coastal wilderness areas within it, so the contiguous " Lost Coast Wilderness " will add a needed balance to the system and provide a unique wilderness experience.

We support the Lost Coast League position calling for: 1) Wilderness designation within the entire King Range National Conservation Area, excluding developed portions of Shelter Cove, with a legally described corridor for Shelter Cove Road. 2) Further acquisition of undeveloped or unbuildable Shelter Cove lots. 3) Legislative protection for areas BLM recommends only have "administrative" protection. 4) Closing the beach to off-road-vehicles. 5) Removing the air strip at Big Flat. 6) Closing the Horse Mountain Road. 7) Closing the Smith-Etter Road. 8) Life estate agreements for inholdings.

Our specific comments on the Draft Environmental Impact Statement are enclosed.

Sincerely,

Don Morris Maryl Morris

Don Morris & Maryl Morris

enclosure

Comments on the DEIS Preliminary Wilderness Recommendations for King Range WSA and Chemiss Mountain WSA by Don & Maryl Morris

In reviewing yet another set of documents dealing with wilderness preservation, we are reminded that ambivalence always clouds controversies between those dedicated to wilderness preservation and those ready to destroy it by industrial, commercial, and military exploitation. Much of the ambivalence is a ploy to screen interests which their spokesmen wish to cloak as fervent concern for the public good. The differences dividing promoters of development in wilderness areas from those demanding inviolable sanctuaries are rooted in basic economic, political, and ideological attitudes which must be altered if a civilized world community is to prevail.

Wilderness should be preserved as an end in itself; for its geography, topography, and geological structure; its plant and animal life; the action of its streams, lakes, skies, and climate; its process as cosmic sculpture on a grand scale. We should protect wilderness because it is constantly threatened and should remain as a monument to natural beauty, grandeur, and true magesty - a conception that goes far beyond gawking at scenery. The pain wrought upon those who witness its destruction is out of all proportion to the frivolous gratifications of those who profit from its spoilation.

13-2 The most glaring omission from wilderness recommendation is Zone 7 which includes the upper watershed of Honeydew Creek. The upper west fork of Honeydew Creek is protected by the largest stand of old-growth Douglas-fir in the entire watershed (2800 acres), which accounts for the fact that Honeydew Creek continues to be one of the most productive salmonid tributaries in the Mattole watershed. These old-growth stands are also the most important nesting areas in the Mattole for certain threatened bird species including bald eagle and spotted owl. It's deplorable that the largest remnant climax forests in this area has been diminished to only 2800 acres. The old-growth ecosystem is a valuable storehouse of genetic stocks, and provides a future study area of the nature and function of local climax ecologies.

The omission of most of Zone 6 from wilderness consideration is a major flaw in the BLM proposal. Zone 6 represents more than half the parts of the Mattole contained by the KRNCA and includes a large portion of the Bear Creek watershed. Since 1976, the combined efforts of BLM and CCC have restored more than five miles of spawning habitat to salmon and steelhead there. The management plan for Zone 6, which gives top priority to timber harvest, would severely impact stream habitat and adversely affect the restoration efforts.

The DEIS arguments for exclusion of Zones 6&7 from wilderness classification is based on the economic value of the timber versus the intangible wilderness values. From a socio-economic viewpoint, the arguement that harvest of these tress creates more value than their protection by wilderness classification is absurd. A 1981 raptor-use survey of these forests by BLM biologist Jim Decker found the area critical to the survival and breeding of raptors including bald eagle, spotted owl, osprey and goshawk. His study found the area to be so critical that he advised that the area be maintained as raptor habitat. The DEIS team has evidently overlooked this study. In a memorandum dated April 4, 1985, KRNCA administrator John Lloyd advised that 2512 acres in Zone 7 and 1300 acres in Zone 6 be managed for raptor protection. This acreage coincides almost exactly with the old-growth forests at the headwaters of Honeydew and Bear Creeks, and effectively removes 90 percent of the timber in question from harvest porential. The remaining timber is prdominantly overmature, with a high incidence of rot, disease, and wind-twisted trees, valuable only for chipping. Therefore, if this raptor-use area is protected as advised, the remaining timber would be unprofitable to cut. This information, alone, should be enough to require a revision of the DEIS, and a reconsideration by the BLM district manager of his wilderness recommendations.

Considering the significant restoration efforts in the Mattole basin, and a local commitment to sustained production of timber, fisheries, and agriculture, the buffers provided by the protection of the Honeydew and Bear Creek forests are far more valuable in the long run than short-term gain from a one-time timber harvest. A restored Mattole salmon fishery would provide, in three or four years, more income than the one-time harvest of Honeydew and Bear Creek watersheds. Not only would this income be more equitably distributed, but, if rationally managed, would be available year after year. The wound inflicted on the watersheds by logging would delay this recovery indefinitely. The DEIS fails to consider the effects of wilderness designation in the KRNCA on contiguous watersheds outside the area under consideration. This question should be addressed by BLM. In addition, the DEIS fails to consider the $140,000 in state contracts for salmon enhancement and watershed rehabilitation undertaken by member groups of the Mattole Restoration Council in the past five years. Neither does the BLM take into account its own excellent rehabilitation efforts in Zone 6

13-3 The DEIS fails to provide adequate information concerning impacts from ORV (off-road-vehicles) and fails to adequately deal with the watershed problems associated with road deterioration and erosion. What impacts will ORV access to the beach have on marine wildlife such as the California sea lion, harbor seal, and brown pelican? What impacts on road deterioration and wilderness values will 4 wheel drive hunters have if allowed use of spur roads and the Smith-Etter Road? How will the deteriorating roads be rehabilitated? Why does the DEIS fail to adequately

address soil erosion resulting from human activity? BLM studies have inconsistent data on "natural" baseline levels, and accelerated erosion levels caused from human activities. Original Unit Resource Analysis noted 24% to be "natural", while the current DEIS claims 80% levels as "natural".

13-4 The Chemise Mountain WSA has not been recommended for wilderness designation in the DEIS because it is less than 5000 acres and because BLM feels that visitors can't find solitude or opportunities for "primitive" or unconfined recreation in this 4300 acre area, because "sights and sounds" of private lands near the area may at times be noticed. The Wilderness Act does not mandate that all areas be 5000 acres in size in order to qualify for wilderness protection. The Act simply requires that, if the area is less than 5000 acres, it must be of sufficient size as to make practicable its preservation and use in an unimpaired condition. At 4300 acres currently managed as a "Primitive Area", the Chemise Mountain WSA clearly qualifies for wilderness designation. An occaisonal "sight or sound" from Shelter Cove or neighboring rural properties would not be as disturbing to the wilderness experience as the "sight or sound" of the commercial and military jet aircraft which are a visible and audible nuisance all over the earth, and can be experienced from even the remote, inaccessible top of Mount Everest.

The entire King Range National Conservation Area should be designated as wilderness....Keep the Lost Coast Lost!

.....

COMMENT LETTER 14

To all those reviewing the Draft EIS for the Chemise Mountain and King Range Wilderness areas-

I have hiked this coastline for many years.It holds a special place in my heart.A very rugged coastline it is a true wilderness experience.The King Range is one of the few streches of the west coast that doesn't have a road along it.Hiking this isolated coastline is a perfect way to get away with oneself and escape from the troubles of the world.with no reminders of man-with no trail to follow except the ever changing beach.

14-2

Big Flat on the coast is one of the most unique areas I have ever been.A large flat wooded area with wild iris blooming every where in the spring.Big Flat Creek running through the center is fed from the Kings Peak over 4000' and right up against the flat.

A truly isolated area it is not for everone.How can I describe the feeling.If you were to walk into the Yosemite Valley 80 years ago you would be here trying to tell the President and Congress back East how truly unique this area is.

I have read the Draft EIS put out by the BLM.Many years ago I took a tour of the camping areas and trail heads,put on by the BLM. This was for the Management Program of the area.It was clear then that the men giving the tour knew this area needed to be protected. Faced with pressure from off-road motor users,ranchers and logging interests these people have seen this area first hand and know in their hearts it must be protected.

The BLM's Preliminary Wilderness Recommendation is for Alternative 5.I have compared this proposal with the others and have found some major problems with it.I myself would go for Alternative One with some added protection.

First off the Eastern Boundary of Alternative 5 (see page 2-12) discribes Saddle Mountain Road running from the Smith-Etter Road, easterly and then southerly to the South Fork of Mitchell Creek.I drove this road to the trail head of Kings Peak.It does not continue on to the Smith-Etter Road.After talking to Earl Curran at the Ukiah BLM office,he agreed this was a mistake.In supporting the boundaries of Alternative 1 this is important to me. I feel this road should be closed back to the county road.

14-1

The best work of the Honeydew must be protected.It includes the rare spotted Owl as well as other endangered species.This area was left out of the BLM recommendations for wilderness.This is one of the few headwaters that the salmon still return to .This is because of it's isolation and the fact that most of this area has never been logged.Like many areas along the coast the ground is steep and loose.There is only 60,000 MBF of timber in this area.Even the BLM says,(see page 4-3)-

14-3

> "..this loss of timber production because of wilderness designation may be significantly overstated.Wildlife inventories for Honeydew Creek,as required by the King Range Management Program have not yet established wildlife use.If it is finally determined that timber production should be curtailed in the Honeydew Creek drainage to enhance wildlife,then some loss of volume will occur regardless of wilderness status."

It must also be noted that many of these old-growth trees are probobly full of rot and would just be made into chips.

Another problem I have with Alternative 5 is it still leaves the southern area to Black Sands Beach open to off-road motor use.The road to Black Sands Beach has been washed out by Telegraph Creek.It is dangerous for anyone to be going in or out of this area.Only a bunch of out-law bikers are using this area.Steps should be taken by the BLM and the State to close off this area completely.I would suggest the BLM buy up sections of this beach,from the Shelter Cove Company that is trying to sell it anyway.An aggrement between the State and BLM could then be reached to put in a large barrier of rocks running into the ocean.Another idea might be housing a guard.This has been a problem for some time.Many long time residents are afraid to speak out,because they are truly afraid of these punks.Since this is to be the entrance and exit for the only coastal wilderness on the West Coast it seems to me this problem of motor-vehicles should not be left to spoil the experience for the general public.

Another problem I have with all these Alternatives is the continued grazing of livestock ,on the northern portion of this Wilderness

Study Area.Even with limiting the herds it is still a problem. They tend to gather at the mouth of rivers and flats.These are also the prettiest spots to camp and rest.They leave there unnatural mark on such places as Spanish Flat.In a true wilderness like this you don't make compromises.There is no reason the BLM should not stop these leases when they run out.

14-5

My strong feeling is that the Etter-Smith road and Telegraph Ridge Road be open only to the private owners within the Wilderness Area. The BLM should continue to try and buyup these small private holdings. Then I would like to see these roads closed completly.There are many other areas hunters and campers can go,but they do not belong in the only coastal wilderness area.

Back to the heart of the King Range Big Flat.I know the temptation two young surfers,who own a h se and dirt air strip there have fallen into.When I got back from first seeing Big Flat I looked up who then owened this area.I would live there myself if I could,but that isn't the point.For the public to be sharing this area as wilderness is a much greater good than the benifit of to lucky surfers.To look up and see a plane flying out of Big Flat just can't make for good 'Karma'.I would hope the BLM could make an agreement with these two men to buy up the air strip now,and the house when they both die. If not the BLM should use it's power of Immanent Domain in the best interests of the public.

14-4

5-45

Part 11

Chemise Mountain WSA

I have just returned from hiking the Chemise Mountain Wilderness area.It is one of the most isolated coastlines one will ever find. The trail goes from the top of Chemise Mountain 2598' richt down to the beach.At the end one must use ropes to get down the last part,as the trail is just one big rock slide.Once on the beach there is no other way out unless you swim.Rock barriers at the north and far south prevent man and his vehicles from going in or out.Truly more isolated than many larger wilderness areas.

I slept on the beach and had to watch the tide.The hike out was even more difficult and dangerous.This part of the trail should eather be closed or made safe.

On Chemise Mountain it was clear and the view of Shelter Cove was far off.It was hard to make out any signs of man.To the east the view was magnificent with the exception of one blue house and barn. The trees in front of this place should hide it in a few years.With no real good reason why this should not become wilderness designated, I don't understand the BLM leaving it out.My guess is only a hand full of these men have actually hiked this trail to the beach.

The whole wilderness area was very clean.With an area this difficult to hike most people who do make it don't leave much behind.

The BLM plan on connecting this trail system to the Sinkyone State Wilderness Park bordering on the south.A good idea.

After reading the BLM's Preliminary Wilderness Recommendations I couldn't disagree more with them. (see page 2-19) My view was.

(1) The Shelter Cove subdivision could not be seen.The northern boundary does not have to be up against the county road.

(2) The sights and sounds to the east were most breath taking. (With the one exception stated above)

(3) The two classifications are not the same and to be truly protected it should be classified a Wilderness Area.

(4) The total acres 4,300 is large enough for a wilderness area. It will be connected to the Sinkyone Wilderness Park and the beach is even more isolated than the King Range.

Wilderness areas are not always for everyone.They are for the few brave souls who really want to escape the greed and madness that his fellow man have created around him.In these wilderness areas one can find peace with oneself and nature.With these two strips of coastline being the only two wilderness areas on the west Coast,I can see no reason to compromise with outside interests.If a society is to truly live in peace we need areas like this protected from our own destructive nature.The word freedom has little meaning to me.One mans freedom is always another mans lack of it.

Wilderness Recommendations for Chemise Mountain and King Range cont.

The wild freedom of the dirtbiker is a destruction of my peace as well as the natural beauty of things.The freedom to drive up and shoot a deer is another example.When we learn to respect each others right to 'peace' then the word freedom will have little meaning. Let us find peace by protecting all of the King Range.The President and Congress can make both of these areas all Wilderness.Shut out the cars,the cows,the men with guns,the chain saws,the oil men,the miners, the bikers,

and let man find only 'peace' and beauty here-

Russel D Hill

P.O.Box 35
Covelo,CA 95428

COMMENT LETTER 15

Harold W. Wood, Jr.
3603 Hillsdale #75A
Visalia, CA 93291

June 4, 1985

Van W. Manning
District Manager
Ukiah District Office
Bureau of Land Management
P.O. Box 940
Ukiah, CA 95482-0940

Dear Mr. Manning:

I would like to submit the following comments on the draft Environmental Impact Statement prepared for the King Range Wilderness Study Area. Please add my name to your mailing list for future consideration of wilderness and management proposals for the King Range National Conservation Area

I strongly disagree with the statement on page 2-21 that the All-wilderness Alternative One would have "negligible beneficial impacts" on the Vegetation Resource/Value. Not only will an all-wilderness alternative provide representation of biological diversity to the wilderness system, as the DEIS notes, but it will provide major beneficial impacts for the vegetation and wildlife in the area. It seems obvious that development uses such as logging and ORV's consistently threaten the viability of plant and animal species, while Wilderness protects the biota. BLM must revise the EIS to reflect this truth, documented with not just descriptions of the plant life, but how the species composition is modified by human impacts.

5-47

15-1

The Chemise Mountain Primitive Area should be changed to recommend wilderness designation for the entire Chemise Mountain WSA. The Primitive Area management proposed in the Alternative 2 No action - Proposed action for Chemise is substantially identical with the purposes for which Congress enacted the National Wilderness Act of 1964, and primitive area management is precisely what the Wilderness Act is intended to supplant.

15-2

The discussion on page 2-19 must be extensively revised, as it is loaded with inaccuracies and illogical statements:

(1) is not a logical reason to preclude Wilderness, because there are numerous Wilderness Areas located within sight of human developments, including the John Muir Wilderness in California, the Clearwater Wilderness in Washington State, and many others. Additionally, a paved road being part of the WSA boundary is no excuse for the "no action" alternative, as many, if not all, national park wilderness boundaries are located on paved roads and even national forest wilderness boundaries are in some cases on paved roads.

(2) To assert that the sights and sounds of private lands to the east significantly impact the feeling of solitude is nothing but a patent falsehood, due to vegetation and the fact that most of the area is to the west of natural topographic features which screen "sights and sounds" of private developments. This reason for "no action" is so inaccurate that it makes one wonder about the objectivity of the drafters of this document. Does BLM wish to open itself to a lawsuit so badly it must resort to ridiculous claims?

(3) The assertion that the intent of wilderness is similar to the primitive area designation is one which actually supports Wilderness designation rather than BLM's proposed no action alternative. To retain primitive area management in this case is to set up a dual system for wilderness -- congressionally designated and administratively designated. It was the ultimate purpose of the Wilderness Act to take wilderness de-classification prerogatives out of administrative hands, and BLM does Congress and the American people a disservice by proposing no wilderness for Chemise Mountain. The BLM proposal is precisely counter to congressional intent in this regard, a point made amply clear in the legislative history of the Wilderness Act and later in statements by Senator Frank Church as Chairman of the Senate committee having jurisdiction on National Park Service and Forest Service Wilderness proposals in Idaho. The final EIS should include a discussion of the legislative history of the Wilderness Act sufficient to indicate that if BLM retains its "no action" alternative for Chemise Mountain it is acting contrary to the congressional intent for the Wilderness Act. Of course, a review of this legislative history mandates that BLM recommend Wilderness for all of Chemise Mountain WSA.

(4) states that "opportunities for primitive or unconfined recreation are limited due to the small size, steep slopes, and dense vegetation..." of the area. On the contrary, I have backpacked in this area and found it to be one of the most utterly wild places compared to dozens of other roadless and established wilderness areas given the steep slopes and proximity to a natural shoreline. If there is a future problem with the "dispersal of users" because users are confined to a few trails, this is a problem to be addressed by appropriate wilderness management, NOT a reason for not making a Wilderness designation.

Another major omission in the DEIS is any discussion of non-anthropocentric concerns for fire. On page 1-7, number 6, a concern over fire suppression activites is mentioned. On the contrary, I am more concerned over the lack of discussion about the need to maintain natural fires in order to maintain fire-adapted species such as the Knobcone Pine and Coastal Manzanita (Arctostaphylosglandulosa).

15-3 Wilderness designation, as part of maintaining processes of natural succession, does not preclude BLM from ensuring natural periodic fires which have historically maintained a mosaic of these species with others. The final EIS should discuss this issue in considering alternative wilderness proposals. Due to excess zeal in fire suppression in the past, BLM may have a responsibility to ensure that fire-adapted species are maintained within the KRNCA, and Wilderness designation is the best designation to promote this purpose so as to prevent conflict with consumptive resource use.

What BLM is apparently trying to do is to divide up the various slices of the multiple-use pie, giving something to satisfy various human users but ignoring the benefits to the living land itself. Our society has come to recognize that the protection of air and water quality is something that benefits everyone, not merely airplane pilots or water skiiers. Yet BLM acts as if wilderness preservation is primarily of benefit only to those who experience backcountry recreation. While I have been among those who have enjoyed a backpacking experience in the King Range, it is clear that wilderness preservation is of major benefit to the biotic community itself. We are beginning to recognize in California that the protection of air and water quality serves the public interest in general - even if we never go swimming in a particular river or drink its water, it is still important that its waters be kept clean. The same forthright concern for the land resource should apply in the

15-4 case of the King Range wilderness proposal. BLM errs in considering the proposal as a matter of trade-offs of one form of management for another, e.g. backpacking vs. off road vehicles vs. logging.

While the great majority of land in the United States is treated in an intensive manner with human production goals paramount (perhaps justifiably so), the unusual qualities of the King Range National Conservation Area as an unique area of coastline under federal government owenership demands different treatment. The evaluation of the DEIS of the All-Wilderness alternative is perfunctory and insufficient in that it compares that alternative only in context of the other four alternatives as if the KRNCA was an island of its own, to be "equitably" divided up among various so-called "competing" interests. This is a defect of the DEIS which can be remedied only if the final EIS evaluates the all-wilderness alternative in terms of the whole context within which the KRNCA exists ---- as an unique roadless coastline surrounded by intensive "management" of lands for silvicultural, agricultural, socio-industrial, and urban uses, in a state which has only isolated patches of natural coastline remaining but which threatens the viability of most of the non-public land in the state for any natural values. In this context, BLM should consider Alternative 1, the all-wilderness alternative as mandatory for the King Range WSA.

In conclusion, the DEIS is inaccurate and overly terse in its evaluation of the wilderness potential for both the Chemise Mountain and King Range WSA's. BLM should propose all-wilderness for both WSA's. In addition, the final EIS should consider alternatives such as marine sanctuary and/or wilderness designation for the abutting ocean area off the KRNCA. Since the Interior Department is responsible for the

15-5 subsurface resources of coastal areas, it is mandatory that BLM consider methods to protect the KRNCA from offshore oil development, which could extensively threaten any proposed wilderness on the land area.

Sincerely,

Harold W. Wood, Jr.

COMMENT LETTER 16

45 Hillpark Avenue
Great Neck, NY 11021
June 18, 1985

Mr. Van W. Manning,
District Manager
Bureau of Land Management
PO Box 940
Ukiah, Calif. 95482

Dear MR. Manning:

My friends asked me to write this letter for them, as well as for myself, therefore, please consider this as many letters, and not jsut one, and I will giveyou a list (enclosed herewith) ofthe friends who are writing this with me.

All of us ask you, beg of you, plead with you to please, please, SUPPORT ALTERNATIVE 2, the All Wilderness Plus alternative. You must not allow offroad vehicles in any part of these wildernesses. The King Range Wilderness must be protected in all its present glory. It is time the Bureau of Land Management started doing the job it was meantt to do, to protect our lands. It is time that you stopped giving our lands away to developers, etc. Once our public lands and national parks are gone, nothing can ever bring them back again.

The entire King Range National Conservation area should be protected as wilderness and there must not be any roads within the wilderness. The jeep trails must be closed and allowed to revert to a natural state. Also, Off-road vehicles must be prohibited from the beach in the King Range.

All of us writing this lettr, plead with you, to do as we ask, for these lands belong to ALL WE AMERICANS, and it is time that your bureau did what the majority of the Americans want - THIS IS OUR LAND AND IT MUST BE PROTECTED.

Sincerely yours,

Lillian Bieber

Mrs. Lillian Bieber, and pr attached list

Enc.

General & Mrs. B. VanderClute	Valley Stream, NY
Doctor Nathan Brody	Floral Park, NY
Mrs. Marion Novin	Floral Park, NY
Mr. & Mrs. L. Asen	Great Neck, NY
Mr. & Mrs. B. Weinberg	Great Neck, NY
Mr. & Mrs. G. Roberts	GReat Neck, NY
Mr. & Mrs. Z. Talent	Great Neck, NY
Mr. & Mrs. S. Wilson	Great Neck, NY
Mrs. Florence Klein	Great Neck, NY
Mrs. R. Rosenstein	Great Neck, NY
Mrs. M. Rosenthal	Floral Park, NY
MRS. CONRAD NAGEL	New York, NY
Mr. Jerry Levitt	New York, NY
Mr. & Mrs. G.Linsky	Glen Head, NY
Mr. & Mrs. T. Douso	Glen Head, NY
Mr. & Mrs. S.Madigan	Glen Head, NY
Mr. & Mrs. K. Nesky	Glenwood Landing, NY
Mr. &Mrs. R. Shildston	Locust Valley, NY
Mr. & Mrs. J. L. Jones	Hendersonville, N. C.
Mr. & Mrs. D. Williamson	Export, Pa.
Mrs. S. Peterson	Asheville, N. C.
Mr. & Mrs. B. Maurer	Ridgefield, Conn.
Mr. & Mrs. B. Bergman	Scarsdale, NY
Mr. & Mrs. C. Mallow	Orlando, Fla.
Mr. & Mrs. J. O'Connell	Mineola, NY
Mrs. Dorothea Hogarty	Mineola, NY
Mr. Arthur Sullivan	Mineola, NY
Mr. & Mrs. E. Ettinger	Bellmore, NY
Mr. & Mrs. L. Bukzin	Forest Hills, NY
Mr. & Mrs. D. Workman	Bradenton, Fla.
Mr. Patrick Brennan	Bradenton, Fla.
Mrs. Molly Mowsbauer	Bradenton, Fla.
Mr. & Mrs. F. Lefferman	Bronx, NY
Mr. & Mrs. M. Gould	Culver City, Calif.
Mrs. Ceil Mills	Woodland Hills, Calif.
Mr. & Mrs. A. Gregario	Glen Cove, NY
Mr. & Mrs. R. Ragazzi	Centerport, NY
Mr. & Mrs. S. Azarkowitz	Little Ferry, N. J.
Mr. & Mrs. M. Golup	Hackensack, N. J.
Mr. & Mrs. J. Levin	Woodbury, NY
Mrs. Betty Fresiello	Sea Cliff, NY
Mrs. E. Dukes	Queens Village, NY
Mrs. Elizabeth Jacobsen	Bronx, NY
Mr. & Mrs. L. FArber	Syosset, NY
Mr. & Mrs. L. Levine	Silver Springs, Md.
Miss Susan Peters	Macon, Ga.
Mr. & Mrs.Joel Novin	Spokane, Wash.
Mr. Peter Yanello	Brooklyn, NY
Mrs. A. Freedman	W. Hempstead, nY
Mr. & Mrs. M. Kass	Flushing, NY
Mr. Michael Rassin	Flushing, NY
Mr. & Mrs. S. Nevins	Baldwin, NY
Mr. & Mrs. F. Cicalese	Glen Cove, NY
Miss Ellie Collins	New York, NY
Mr. & Mrs. Ed Novin	Arverne, NY
Mr. & Mrs. F. Cannata	Pomona, NY
Mr. & Mrs. B. Dixon	Floral Park, NY
Mrs. P. Ferrara	Glen Cove, NY
Mrs. Winnie Hansen	Libertyville, Ill.
Mr. J.Koski	New York, NY
Mrs. Helen Fine	Floral Park, NY
Mr. Richard Wischeche	Floral Park, NY

Letter 1 - Bureau of Mines

Response 1-1.

We apologize for the inconsistent references to the level of mineral potential and the incorrect statement that wilderness designation would have no effect on mineral development. The summary of the mineral potential report uses the phrase "low to moderate"; the body of the report uses phrases such as "very low" and "have no economic significance." Our conclusion is that the potential for mineral development on the WSA is low (see page 1-7 of this FEIS). Although it is always possible that an economic mineral discovery will be made, to develop a scenario for such development and analyze in this EIS the impact of such development on other resources and the impact of wilderness designation on such a low probability scenario would be beyond the rule of reason.

Response 1-2.

The term "nuisance" was a poor choice of words and has been deleted from this FEIS. It was used to refer to invalid claims made when there is no real possibility of or intent for productive development.

Letter 2 - U.S. Environmental Protection Agency

Response 2-1.

The possibility of including resource maps in this FEIS was considered but decided against because it was felt that the areas that would be impacted could be adequately described and located in the text with references to the maps of the alternatives.

Response 2-2.

All potential mitigating measures have been incorporated either directly or by implication into the management actions described in Chapter 2. No new measures were developed during the analysis (see page 4-1). No significant impacts on water quality are anticipated. See page 1-6 of this FEIS. Site-specific mitigation measures for specific projects, such as timber sales, will be developed in the environmental analysis for those projects.

Letter 3 - The Resources Agency of California

Response 3-1.

The area referred to has not been added to the suitably recommended portion of the WSA under the Proposed Action. Instead, it will be designated an Area of Critical Environmental Concern (ACEC).

Response 3-2.

The Chemise Mountain WSA is now recommended for wilderness designation (see page 1-10 of this FEIS).

Response 3-3.

The map of the Chemise Mountain WSA has been corrected to show the boundary of the Sinkyone Wilderness State Park. See Map 2-4.

Response 3-4.

See Response 1-1; Item No. 3 on page 1-7; and Item No. 2 on page 1-8 of this FEIS..

Response 3-5.

Most of the information requested in April 12, 1984, letter is too site-specific to be relevant to this level of planning. The parts that are relevant have been incorporated in this FEIS.

Response 3-6.

The recreation plan includes acquisition priorities, map update recommendations, monitoring and visitor service requirements, or activities outside of the WSA. Information in it was used to develop the recreational use estimates in this document.

Response 3-7.

BLM shares your concern over the actual and potential use of ORVs on portions of the beach that are closed to their use. For example, under the Proposed Action, Management Action 30 (page 2-7), we specify that if off-road vehicles breach barriers at the parking area to be established one-third mile from the beach at the west end of the Smith-Etter Road, the closure will be moved 4 miles up the hill to where the gate is presently located. For the purposes of this analysis it must be assumed that the various management actions, including the various road and beach closures, will be effectively carried out and enforced.

Response 3-8.

Roads within the suitably recommended portions of the WSA will be closed to general public use under the Proposed Action.

Letter 3 (Continued)

Response 3-9.

The analysis presented in this FEIS does take into consideration the proximity of Sinkyone Wilderness State Park. This is reflected in both the recreational use estimates and description of the trail systems. The idea of a joint management plan for the areas is good and will be seriously considered.

Response 3-10.

See Responses 3-7, 5-9, and 15-5.

Response 3-11.

Designation of the Chemise Mountain WSA as a wilderness area would provide added protection to the contribution that area provides to scenic vistas from the King Range WSA and Sinkyone Wilderness State Park. However, this possible impact was not identified as an issue (see pages 1-6 and 1-8) and, therefore, was not analyzed in the FEIS.

The vulnerability of cultural resources is recognized and discussed on pages 1-6, 2-8, 3-12, and 4-8. Also see the response to comment 3-7.

Response 3-12.

Fire access is provided by the existing road network and by use of ridgetop helipads allowed under all alternatives. See the Fire Management Actions that are listed in Chapter 2 for all alternatives under both WSAs.

Response 3-13.

There are no mining claims or leases within either of the WSAs. Following wilderness designation casual (non-surface-disturbing) exploration would be allowed, but surface-disturbing exploration and development would not be allowed since there appear to be no valid pre-existing rights.

Response 3-14.

This EIS analyzes the impacts of wilderness designation or nondesignation and not the impacts of off-site activities. The Minerals Management Service will discuss impacts of offshore development in the environmental documents for such development. Also see Response 5-9.

Response 3-15.

The Bureau is not aware of any potential industrial development in the area. See Response 3-14.

Letter 4 - Humboldt County Board of Supervisors

Response 4-1.

See Response 3-12.

Letter 5 - California Wilderness Coalition

Response 5-1.

The studies you suggest are not a required part of the wilderness analysis process and sufficient funding is not available to conduct them. What is more, no remarkable, previously unknown wilderness values were discovered in the Rocky Creek-Cache Creek WSA (BLM was aware of use of the area by wintering bald eagles) and it is unlikely, that any would be discovered in the King Range or Chemise Mountain WSAs.

Response 5-2.

Specific management actions for each alternative are listed in Chapter 2. The impact of these management actions on the issues selected for analysis (see page 1-5) is analyzed in Chapter 4.

Response 5-3.

The alternatives considered in the FEIS have been changed to exclude vehicles from the roads within suitably recommended portions of the WSA and the beach. Any predator control conducted will be done under the constraints of the Wilderness Management Policy. The Primitive Area designation will not necessarily become obsolete following Congress' decision on the WSA and if it does make it obsolete and does not make the area wilderness, it is BLM's intention to continue to manage the area under the same guidelines regardless of formal designation.

Response 5-4.

The Partial Wilderness Alternative is about 200 acres smaller than the majority recommendation of the Technical Review Team.

Response 5-5.

The introduction to Chapter 2 (page 2-1) explains the meaning and purpose of the management actions. Regardless of whether it is stated that a management action may, could, would or will be implemented, the analysis of impacts must assume that it will be implemented; otherwise, there is no impact to analyze. Separating actions that definitely would be allowed under wilderness designation from those the implementation of which is a matter of interpretation would unnecessarily complicate the format and the analysis. Instead, a good faith effort has been made to determine what the management actions would be and the analysis has been based on those actions.

Letter 5 (Continued)

Response 5-6.

The issues considered are not limited to those considered in the 1974 Plan. A strong effort has been made to include all issues that are currently relevant (see pages 1-5 to 1-8 of this FEIS). The All Wilderness Alternative has been revised to include the closure of all roads and beaches in the WSA to vehicles.

Response 5-7.

The Bureau's wilderness recommendation recognizes roads and the existence of other intrusions in order to arrive at a manageable, well-defined, and rather unique wilderness.

Two factors should also be remembered: (1) The roads were present long before the WSA was established, (2) much of the land within the WSA was in private ownership when the WSA was established, making cherrystemming of the roads impossible.

In addition, the Proposed Action and alternatives have been modified to close all roads within the suitably recommended portion of the WSA to the public except for private inholders and, in some cases, livestock operators.

Response 5-8.

The All Wilderness Alternative in this document (the FEIS) includes the lands dropped by former Interior Secretary James Watt and the closure of the roads and the beach to vehicle access.

Response 5-9.

The All Wilderness Alternative assures in a general way that the State lands below mean high tide will be managed in a manner compatible with wilderness. However, to consider in this document the impact of actions that the State of California may take on lands under their jurisdiction would not be appropriate.

Response 5-10.

See Response 5-8.

Response 5-11.

The statement on page 2-15 of the DEIS notwithstanding, any predator control conducted will be done under the constraints of the Wilderness Management Policy.

Letter 5 (Continued)

Response 5-12.

The All Wilderness Alternatives has been expanded beyond the ridgeline to examine the inclusion of this area. See page 1-10 of this FEIS.

Response 5-13.

The statement on page 2-15 of the DEIS that Gitchell Creek is a natural boundary is not meant to imply that Gitchell Creek is an effective barrier to ORVs. It is a natural boundary in that it is easily defined both on a map and on-the-ground. Assuming that vehicles remain south of Gitchell Creek (an enforcement problem BLM has yet to completely solve), the creek itself serves as a buffer between the area open and the area closed to vehicles, thus "eliminating conflicts with vehicle use on the beach between Gitchell Creek and Telegraph Creek."

Response 5-14.

All of the WSA meets the minimum requirements for wilderness. It is our judgment, however, that the lighthouse and other facilities in the northern part of the WSA would continue to detract from the wilderness setting and that this part of the WSA, particularly at the mouth of the Mattole River, can be better managed under multiple-use.

Response 5-15.

See Response 5-7.

Response 5-16.

See Response 5-11.

Response 5-17.

See Response 5-3.

Response 5-18.

The recommendation for the Chemise Mountain WSA has been changed. The entire area is now recommended as suitable for wilderness designation. See page 1-10 in this FEIS.

Response 5-19.

A revised analysis of motorized recreational use on the King Range WSA can be found in Chapter 4 of this FEIS.

Response 5-20.

We are not saying that the area lacks opportunities for primitive and unconfined recreation. Rather, we contend that those opportunities are not outstanding when compared to opportunities available on other WSAs.

Letter 5 (Continued)

Response 5-21.

See Response 5-6.

Response 5-22.

See Response 5-11.

Response 5-23.

The sections referred to have been rewritten. See Chapter 4, pages 4-8 and 4-9.

Letter 6 - Environmental Protection Information Center, Inc.

Response 6-1.

The area referred to has been included for consideration in the All Wilderness Alternative but is not included in the Proposed Action.

Response 6-2.

Interim Management Policy (IMP) is irrelevant to the decision at hand.

Response 6-3.

Only Chemise Mountain was an instant study area; this was due to its designation as a primitive area.

Response 6-4.

An issue can be defined as a topic of concern. Pages 1-5 through 1-9 describe the issues that are analyzed in this FEIS and those that were considered, but dropped from further analysis. The analysis of these issues is based on site-specific management actions--see Chapter 2.

Response 6-5.

No specific Partial Wilderness Alternatives which were significantly different from those analyzed in the DEIS were presented during the scoping process. The response from E.P.I.C. (letter dated April 18, 1984) was typical of the responses; ". . . E.P.I.C. Inc.," stands in favor of full wilderness designation for both the King Range and Chemise Mountain WSAs. In addition we urge the restoration of all split-estate lands to the King Range WSA . . . ." This is Alternative 2-2, the All Wilderness Alternative.

Letter 6 (Continued)

Response 6-6.

The Technical Review Team (TRT) used "zones" to aid their deliberations, identifying the pros and cons of small areas or watersheds. This has nothing to do with the zones in the 1974 King Range Management Program, and is the same analytical technique used in most public comments including the July 1, 1985, comments from the Lost Coast League (Comment Letter 7) and even this letter which references Honeydew Creek and other specific watersheds.

Response 6-7.

Scoping for the DEIS was intended to gather information to focus issues for analysis and suggestions for alternatives. This resulted in 21 letters with 117 signatures. Seven letters were "for" wilderness and five were "against" with the rest either acknowledgments or purely informational with no wilderness stand. the pro wilderness letters had eight signatures, the "anti" wilderness letters had 100 signatures.

Response 6-8.

The All Wilderness Alternative in this FEIS closes the entire beach and all roads within the WSAs to ORVs.

Response 6-9.

All existing rights are determined as of the date of enabling legislation for the particular wilderness area.

Response 6-10.

Only certain uses can be "grandfathered" and this does not include public vehicular use.

Response 6-11.

See the last paragraph of Response 13-3.

Response 6-12.

Existing mining claims are outside the WSA. This study is to determine suitability for wilderness not to determine environmental consequences of mining activities.

Response 6-13.

The gates referred to were constructed by BLM to protect the roads which had been seeded and "put to bed." The road "improvements" were made by the operator to allow access for annual assessment work. See page 3-11 of this document for more information on mining and mining claims.

Letter 6 (Continued)

Response 6-14.

In each case the sites are being excavated because of either stream or wave erosion. Actual or potential ORV use is not and has not been a factor in deciding to do the excavations.

Response 6-15.

CEQ regulations require a 30-day inaction period after distribution of the final environmental impact statement during which time no decision can be implemented (40 CFR 1506.10(b)(2)). No additional hearings or reviews of BLM's recommendations for these WSAs are anticipated.

Letter 7 - Lost Coast League

Response 7-1.

Some of the issues you are concerned about have been addressed and others have been determined to not merit detailed analysis. See pages 1-5 to 1-9 in this FEIS.

Response 7-2.

There was no intent to list all the fauna and flora within the King Range. We believe the level of information is sufficient for the purpose of this level of analysis and planning.

Response 7-3.

Only 32,900 acres of the KRNCA's 54,000 acres are within the WSA. An analysis of impacts outside the boundary of the WSA is beyond the scope of this EIS.

Response 7-4.

The area you reference is included in the All Wilderness Alternative in the FEIS and, therefore, has been given full consideration for wilderness designation. In addition, it will be designated an Area of Critical Environmental Concern (ACEC) under the Proposed Action.

Response 7-5.

The Chemise Mountain WSA is now recommended for wilderness designation.

Response 7-6.

The area referred to will be designated an Area of Critical Environmental Concern (ACEC) under the Proposed Action.

Letter 7 (Continued)

Response 7-7.

Impacts on archaeological resources are analyzed in Chapter 4 of this FEIS. The analysis assumes that BLM will be able to successfully control ORV use and barricade the cultural sites.

Response 7-8.

BLM is familiar with the information in the studies referred to and it does not materially add to the information already in the Chapter. Species lists are generally not useful in EISs or for planning.

Response 7-9.

The impact of the alternatives on salmon and steelhead spawning and nursery streams has been analyzed in this FEIS. See page 1-6 and Chapter 4.

Response 7-10.

Boundary locations were developed during the planning phase the results of which are summarized in this FEIS. See pages 1-9 and 1-10.

Response 7-11.

The FEIS has been reformatted to specifically analyze the impact of the management actions projected under each alternative on the issues identified during the scoping process.

Letter 8 - Mattole Valley Community Center

Response 8-1.

The old-growth timber reserve you cite is included in the All Wilderness Alternative in this FEIS and, therefore, has been given full consideration for wilderness designation.

Letter 9 - Society for the Protection of Nature in Israel

No response required.

Letter 10 - Wilderness Society, California/Nevada Region

Response 10-1.

The Mattole River area was included in the All Wilderness Plus Alternative (Alternative 2) in the DEIS and is included in the All Wilderness Alternative in this FEIS. Thus, this area has been given full consideration for wilderness designation. See Response 5-14.

Letter 10 (Continued)

Response 10-2.

The Environmental Consequences Chapter has been rewritten to assess the impact of the actions you mention.

Response 10-3.

The Environmental Consequences Chapter has been reformatted as you suggest. However, some of the issues you mention were not found to be significant enough to merit detailed analysis. See pages 1-6 through 1-8 of this FEIS.

Response 10-4.

See Response 5-3 and Response 5-11.

Response 10-5.

Grazing allotments are assigned under the authority of Section 402 of the Federal Land Policy and Management Act of 1976. The numbers of AUMs have fluctuated in recent years because of the land acquisition program and the fact that some of the individuals from whom land was acquired have retained grazing rights. There are currently five allotments totaling 11,900 acres with 3,000 AUMs within the WSA. See page 2-8 of this FEIS.

Response 10-6.

Vehicle closures are designations under authority of Executive Order 11644 (as amended) which require designation of trails and areas as open, limited, or closed to off-road vehicle use. The BLM does have enforcement responsibility.

Response 10-7.

The entire Chemise Mountain WSA is now recommended for wilderness designation. See page 1-10 of this FEIS.

Response 10-8.

The Primitive Area and the Wilderness Study Area are not the same. Acreage figures for the study area fluctuated because of land acquisition and stands at about 4,340 acres; this figure includes only public land within the external boundaries of the WSA. The figure for the Primitive Area is land officially designated.

Letter 11 - Alan L. Bellon

Response 11-1.

See Response 5-2.

Response 11-2.

See Response 5-2.

Letter 12 - Douglas Fir

Response 12-1.

The east slope you cite is included in the All Wilderness Alternative in the FEIS and, therefore, has been given full consideration for wilderness designation. However, it has not been included as part of the Proposed Action but will be managed so as to protect the area's unique character.

About 300 acres east of the main ridgeline and within the WSA boundaries have been logged recently enough to be noticeable on aerial photos.

Response 12-2.

See Responses 5-3 and 5-7.

Response 12-3.

The statement referred to has been deleted in this FEIS.

Response 12-4.

The impacts of these actions are analyzed in the FEIS. See the management actions listed in Chapter 2 and analysis of the impact of those actions in Chapter 4.

Letter 13 - Don and Maryl Morris

Response 13-1.

The King Range and Chemise Mountain WSAs are considered separately because they are distinctly separated by the Shelter Cove development and the Shelter Cove Road. According to the definitions established in the Act, they are separate areas. However, with or without designation, management of the two areas will be carefully coordinated.

Response 13-2.

Much of the Honeydew watershed area under consideration will be designated an Area of Critical Environmental Concern (ACEC) under the Proposed Action. See pages 1-9 and 1-10 of this FEIS.

Letter 13 (Continued)

Response 13-3.

No impacts on marine wildlife are anticipated from any of the management actions. Impacts of vehicles are discussed in the "Impacts of the Roads" and "Impacts on Wilderness Values" sections of Chapter 4 of this FEIS. Roads will be maintained and rehabilitated using standard techniques including graders.

Due to the extremely steep slopes, a result of the "youth" of the King Range, the overall erosion rate is about 80 percent natural erosion. In small watersheds on local areas, particularly on acquired land on the east side of the WSA, man-caused erosion (accelerated erosion) constituted a much higher proportion of the overall rate at the time the unit resource analysis was written (1973-1974).

Response 13-4.

The Chemise Mountain WSA is now recommended suitable for wilderness designation. See page 1-10 of this FEIS.

Letter 14 - Russell Hill

Response 14-1.

The boundary description in the DEIS was confusing. In this FEIS the area recommended suitable for wilderness has been revised (see pages 1-9 and 1-10) with the details of the boundary explained simply by referencing Map 2-1.

Response 14-2.

Much of the watershed of the North Fork of Honeydew Creek has now been protected by the establishment of the Old-Growth Reserve. See Response 13-2.

Response 14-3.

By law grazing is an acceptable nonconforming use in wilderness areas. BLM cannot terminate the leases just because of wilderness designation.

Response 14-4.

BLM plans to continue to acquire land from willing sellers within the WSA. This will eventually simplify management of the roads because BLM will have greater control.

Response 14-5.

The recommendation for the Chemise Mountain WSA has been changed to All Wilderness. See page 1-10 of this FEIS.

Coordination

Letter 15 - Harold W. Wood, Jr.

Response 15-1.

This issue of impacts on botanical resources is discussed on page 1-7 of this FEIS and dropped from further analysis. Although logging and other management actions and activities that would take place under the alternatives would impact individual plants and plant communities, any damage would be minor (relative to the botanical resources of the area as a whole) and temporary.

Response 15-2.

BLM's recommendation is now that the entire Chemise Mountain WSA be designated wilderness. See page 1-10 of the FEIS.

Response 15-3.

BLM shares your concern about maintaining fire-dependent ecosystems in this area. To help accomplish this, the management actions under all alternatives for both WSAs include prescribed burning (see pages 2-1 to 2-21). The fire management actions (pages 2-8 and 2-18) are designed to control, not eliminate, fire.

Response 15-4.

Although the benefits of wilderness that you mention are valid, BLM's responsibility is in fact to reach its decision by balancing these benefits against uses or benefits that would be lost under wilderness designation.

Response 15-5.

The alternatives suggested for analysis are beyond BLM's authority and the intent of the Wilderness Act. See Responses 11-9 and 13-3 and page 1-11 of this FEIS. The possible impact of off-site projects on the WSA are not the subject of this EIS. Such impacts, for example, possible offshore oil development, would be analyzed by appropriate agencies if and when specific proposals are made.

Letter 16 - Lillian Bieber, et al.

No response is necessary.

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References

REFERENCES CITED

Bailey, Robert G., 1976, Ecoregions of the United States, USDA, Forest Service.

Barbour, M. and J. Major, eds. 1977. Terrestrial Vegetation of California New York: Wiley.

Barrows, K., Frake, K., Stevens, C., Weinberg, E. 1983. Old-Growth Reserve System: Biological Inventory and Management Consideration. Unpublished manuscript. USDI, Bureau of Land Management, Ukiah, California.

Daubenmire, R. 1978. Plant Geography. San Francisco: Academic Press.

Fredrickson, David A. 1975. An Archaeological Reconnaissance of the Beach and Marine Terraces of the King Range National Conservation Area. Ms. on file, Bureau of Land Management, Arcata Resource Area Office, Arcata, California.

Hildebrandt, William. 1981. Native Hunting Adaptations on the North Coast Region, of California. Ph.d. Dissertation. University of California, Davis.

Kuchler, A.W., 1966, Potential Natural Vegetation of the United States, USDI, Geological Survey.

Levulett, Valerie A. 1976a. A Second Archaeological Reconnaissance Within the King Range National Conservation Area. Ms. I-21 on file, Bureau of Land Management, Ukiah, California.

-------. 1976b. A Third Archaeological Reconnaissance Within the King Range National Conservation Area. Ms. I-63 on file Bureau of Land Management, Ukiah, California.

-------. 1977. The King Range National Conservation Area; A Settlement-Subsistence Model. Ms. on file, Bureau of Land Management, Ukiah, California.

-------. 1979. Report of the Archaeological Investigation of Shelter Cove. Ms. on file, California Coastal Commission, North Coast Region, Eureka, California.

-------. 1981a. Report on the Fifth Year of Archaeological Investigations in the King Range National Conservation Area. Ms. I-103 on file, Bureau of Land Management, Ukiah, California.

-------. 1981b. Report on the Investigation of Five Coastal Mattole Archaeological Sites, Humboldt County, California. Ms. I-107 on file, Bureau of Land Management, Ukiah, California.

-------. 1982. Report on the 1979 King Range Coastal Ridge Archaeological Survey and Results of Radio-carbon Dating, Obsidian Sourcing and Fish Bone Identification for Coastal and Interior KRNCA Sites. Ms. I-106 on file, Bureau of Land Management, Ukiah, California.

Roscoe, Kathleen S. 1983. King Range Coast Cultural Resource Management Plan, Humboldt County, California. Ms. on file, Bureau of Land Management, Ukiah, California.

Sawyer, J., Thornburgh, D., Griffin, J. 1977. "Mixed Evergreen Forest". In Terrestrial Vegetation of California. New York: Wiley.

U.S. Department of the Interior, Geological Survey (undated). Mineral Resource Potential of the King Range and Chemise Mountain Instant Study Areas, Humboldt and Mendocino Counties, California.

Glossary

GLOSSARY

ANIMAL UNIT MONTH (AUM): The amount of forage required to sustain the equivalent of one cow or five sheep for one month.

AREAS OF CRITICAL ENVIRONMENTAL CONCERN (ACEC): Areas within the public lands where special management attention is required (when such areas are developed or used or where no development is required) to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes, or to protect life and safety from natural hazards.

CONTIGUOUS: Lands or legal subdivisions having a common boundary; lands having only a common corner are not contiguous.

FLPMA: The Federal Land Policy and Management Act of 1976 (Public Law 94-579, 90 Stat. 2743.43 USC 1701).

IMPACT: To diminish in value or excellence.

KNOWN GEOTHERMAL RESOURCE AREA (KGRA): An area in which the geology, nearby discoveries, competitive interests, or other indicia would, in the opinion of the Secretary of the Interior, engender a belief in men who are experienced in the subject matter that the prospects for extraction of geothermal steam or associated geothermal resources are good enough to warrant expenditures of money for the purpose. (From Code of Federal Regulations (Title 43, Part 1000 to 3999, pg. 436), Office of Federal Register, Washington, D.C., 1981).

LIVESTOCK GRAZING OPERATIONS: Those operations under permit where the primary purpose is the grazing of livestock for the production of food and fiber. Includes pack and saddle stock used in conjunction with such operations.

MANAGEMENT FRAMEWORK PLAN (MFP): The Bureau's basic planning decision document prior to the adoption of a new planning process in 1979, in which the decision document is a Resource Management Plan (RMP).

MINERAL ENTRY: The right to enter the Public Lands (under the administration of the BLM) to search for minerals and to claim or lease such minerals under the mining and mineral leasing laws and regulations.

MOTORIZED EQUIPMENT: Any machine activated by nonliving power source except small battery-powered, handcarried devices such as flashlights, shavers, Geiger counters, and cameras. Also "Mechanized Equipment."

MOTOR VEHICLE: Any vehicle which is self-propelled or any vehicle which is propelled by electric power obtained from batteries.

MULTIPLE RESOURCE VALUES AND USES: The present and potential use of the various resources administered through multiple use management on the public lands and any public values associated with such uses.

MULTIPLE USE: ". . . the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; the use of some lands for less than all of the resources; a combination of balanced and diverse resource uses that take into account the long-term needs of future generations for renewable and nonrenewable resources, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural, scenic, scientific, and historical values; and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output." (From Section 103, FLPMA.)

NATURALNESS: Refers to an area which "generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable." (From Section 2(c), Wilderness Act.)

OFF-ROAD VEHICLE (ORV): Any motorized vehicle designed for or capable of cross-country travel on or immediately over land, water, sand, snow, ice, marsh, swampland, or other terrain.

OUTSTANDING: 1. Standing out among others of its kind; conspicuous; prominent. 2. Superior to others of its kind; distinguished; excellent.

PLANNING AREA: The area for which resources management plans are prepared and maintained. In most instances, it is the same as the resource area, which is a geographic portion of a BLM district, under supervision of an area manager.

PLANNING CRITERIA: The factors used to guide development of the resource management plan, or revision, to ensure that it is tailored to the issues previously identified and to ensure that unnecessary data collection and analyses are avoided. Planning criteria are developed to guide the collection and use of inventory data and information, the analysis of the management situation, the design and formulation of alternatives, the estimation of the effects of alternatives, the evaluation of alternatives, and the selection of the preferred alternative.

PRE-FLPMA: Before October 21, 1976, the date of approval of the Federal Land Policy and Management Act.

PRELIMINARY WILDERNESS RECOMMENDATION: Refers to a wilderness recommendation at any stage prior to the time when the Secretary of the Interior reports his recommendation to the President. Until the Secretary acts, the recommendation is "preliminary" because it is subject to change during administrative review.

PRIMITIVE AND UNCONFINED RECREATION: Nonmotorized and undeveloped types of outdoor recreation activities.

PUBLIC LANDS: For the purpose of the wilderness review program, any lands and interest in lands owned by the United States within the several States and administered by the Secretary of the Interior through the Bureau of Land Management, without regard to how the United States acquire ownership, except:

1. Lands where the United States owns the minerals, but surface is privately owned.

2. Lands being held for the benefit of Indians, Aleuts, and Eskimos.

3. Lands tentatively approved for State selection in Alaska.

4. Lands on the Outer Continental Shelf.

5. Oregon and California grant (O & C) lands that are managed for commercial timber production.

RANGELAND IMPROVEMENTS: Any structural or nonstructural improvements which directly affect or support the use of the forage resource by domestic livestock, such as fences, line cabins, water lines, and stock tanks.

RESOURCE MANAGEMENT PLAN (RMP): The basic decision document of BLM's resource management planning process, used to establish allocation and coordination among uses for the various resources within a Resource Area. An RMP is a "land-use plan" prescribed by Section 202 of the Federal Land Policy and Management Act. RMP regulations appear in 43 CFR 1601. (Refer to definition of Management Framework Plan.)

SOLITUDE: 1. The state of being alone or remote from habitations; isolation. 2. A lonely, unfrequented, or secluded place.

SUBSTANTIALLY UNNOTICEABLE: Refers to something that either is so insignificant as to be only a very minor feature of the overall area or is not distinctly recognizable by the average visitor as being man-made or man-caused because of age, weathering, or biological change. An example of the first would be a few minor dams or abandoned mine buildings that are widely scattered over a large area, so that they are an inconspicuous part of the scene. Serious intrusions of this kind, or many of them, may preclude inclusion of the land in a wilderness study area. An example of the second would be an old juniper control project that has grown up to a natural appearance, the old fallen trees largely decomposed.

SUITABILITY: As used in the Wilderness Act and in the Federal Land Policy and Management Act, refers to a recommendation by the Secretary of the Interior or the Secretary of Agriculture that certain Federal lands satisfy the definition of wilderness in the Wilderness Act and have been found appropriate for designation as wilderness on the basis of an analysis of the existing and potential uses of the land.

WILDERNESS: The definition contained in Section 2(c) of the Wilderness Act of 1964 (78 Stat. 891).

WILDERNESS AREA: An area formally designated by an Act of Congress as part of the National Wilderness Preservation System.

WILDERNESS CHARACTERISTICS: The definition contained in Section 2(c) of the Wilderness Act of 1964 (78 Stat. 891).

WILDERNESS INVENTORY: An evaluation of the public lands in the form of a written description and map showing those lands that meet the wilderness criteria as established under Section 603(a) of FLPMA and Section 2(c) of the Wilderness Act, which will be referred to as Wilderness Study Areas (WSAs).

WILDERNESS MANAGEMENT: The management of human use and influence on lands which have been designated by an Act of Congress as wilderness areas.

WILDERNESS PROGRAM: Term used to describe all wilderness activities of the Bureau of Land Management including identification, management, and administrative functions.

WILDERNESS RECOMMENDATIONS: A recommendation by the Bureau of Land Management, the Secretary of the Interior, or the President, with respect to an area's suitability or nonsuitability for preservation as wilderness.

WILDERNESS REPORTING: The process of preparing the reports containing wilderness recommendations on wilderness study areas and transmitting those reports to the Secretary of the Interior, the President, and Congress.

WILDERNESS REVIEW: The term used to cover the entire wilderness inventory study and reporting phases of the wilderness program of the Bureau of Land Management.

WILDERNESS STUDY: The process that specifies how each wilderness study area must be studied through the BLM resource management planning system, analyzing all resources, values and uses within the WSA to determine whether the area will be recommended as suitable or nonsuitable for wilderness designation.

WILDERNESS STUDY AREA (WSA): A roadless area or island that has been inventories and found to have wilderness characteristics as described in Section 603 of FLPMA and Section 2(c) of the Wilderness Act of 1964 (78 Stat. 891).

WILDLIFE IMPROVEMENTS: Any structural or nonstructural improvements which directly affect or support the use of water, food, or shelter by wildlife, such a guzzlers, water lines, or fences.

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Appendices

APPENDIX A
Sustained Yield Unit 13
Mitigation Measures

COMMENTS	MITIGATION
Soils/Watershed	**Soils/Watershed**
Studies have shown that ridge roads experience minor erosion, whereas roads on the upper one-third slope have seven times as much erosion and roads on the lower one-third slope have ten times as much erosion (Rice 1979b, Anderson no date). The worst location for increased sediment is along streams. Upgrading or improving streamside roads would cause even more of an increase in sedimentation.	Preferred road locations will be on ridgetops and on the upper one-third of the slope.
The amount of erosion (mostly mass wasting) associated with roads increases with the slope of the terrain that the road traverses. Roads built on slopes over 60 percent experience up to 70 percent more erosion than those on flatter slopes (Rice 1979b and Dodge 1976).	Roads will not be built on slopes in excess of 60 percent.
It has been estimated that 50 to 95 percent of the soil eroded from a logged area is eroded within 2 years after completion of harvesting operations. Therefore, it is extremely important that erosion control facilities be maintained during this period (Dodge 1976).	Mainline roads will be maintained at least annually, and more often if warranted. Waterbars and drainage structures on spur roads will be maintained for two years after construction. Rolling grade dips will be constructed and maintained where necessary on mainline and spur roads.
Stabilization of the road surface and improved drainage reduces erosion from surface runoff. The steeper the grade, the more important rocking becomes.	Main haul roads will be rocked to a moderate depth if used year-round. Alternative: roads will be closed to all traffic, including BLM, during the rainy season.
Better design or modification of alignment can reduce mass wasting by 10 percent or more (Rice 1979b).	Geotechnical investigations will be conducted on proposed road locations far enough in advance of construction that major realignment can be surveyed and investigated.
Ripping of skid trails improves plant growth and reduces surface runoff. The need for ripping should be determined prior to treatment and not done as routine. Care should be exercised to prevent further compaction and root damage from the ripping treatment. Skid trails should be ripped during the season when the soils are the driest.	Skid trails will be ripped when needed to improve soil structure.
Less soil will be exposed to raindrop splash erosion and overland flow. Skid trails will not become drainageways into the stream channels.	No excavation will normally be permitted for skid trails.
High ground pressures of 20 to 28 psi exerted by rubber-tired skidders can cause long-term soil compaction problems. On the other hand, crawler tractors exert 6 to 13 psi and the FMC skidder about 5.5 psi, so compaction can be substantially reduced (Froehlich 1979).	Rubber-tired skidders will be prohibited except as swing machines on permanent mainline and spur roads.
Protection of active slides from tractor or road entry will reduce severity and speed of mass movement.	There will be a 100-foot buffer zone atound active slides. Actual tractor or road entry will be prohibited within this zone. No logging will be done in the slide area and buffer zone, but downed trees can be salvaged by end-lining from outside the buffer zone.
Road construction through areas of inactive slides could result in accelerated erosion and increased road maintenance.	Inactive slides will not be undercut by roads.
Where there is sufficient deflection, overhead cable yarding is less damaging then tractor skidding or high-lead ground yarding logs to landings. To get deflection, it could be necessary to cross a creek or canyon to obtain a tailhold on the opposite slope, or there could be logs on the opposite slope that must be removed. The tailhold must be made high enough that excessive soil disturbance does not occur within or directly above the creek buffer zone. This allows full suspension of logs crossing the buffer zone.	Cable yarding across streams will be permitted only if sufficient deflection is available on the yarding corridor to fully suspend logs. Sufficient deflection will be provided to prevent flown logs from hitting the edge of a bench or bluff directly above the creek bank.
Disturbance in the ephemeral channels and drainages is a major cause of erosion and sedimentation.	With the exception of road construction equipment, tractors and other machinery will not be permitted to operate within 30 feet of ephemeral channels and drainage areas. Merchantable trees may be harvested in this zone by directional falling techniques, but nonmerchantable vegetation will be left essentially intact. Hardwood control by hand and replanting may be done to maintain a productive timber site. When necessary, yarding across channels will be done only in dry weather and perpendicular to the channel.

COMMENTS	MITIGATION
Soils/Watershed (Continued)	Soils/Watershed (Continued)
Two major sources of stream sedimentation are washing of dust-coated roadside vegetation and washing and erosion of road surface material. Road oiling is a low cost control of this sediment washing. Successive re-application on continuous use roads will set up the surface material and reduce sediment for a longer period of time.	Road oiling using the proper formulation and successive reapplications will be done on continuous use roads.
Vegetation	Vegetation
BLM must supply its own seed to the nursery. Due to fires and past logging, good seed sources in some areas are difficult to locate and utilize. Numerous seed sources are needed to ensure genetic diversity and seeds best adapted to the site.	BLM will establish at least one seed production area for every seed zone and appropriate elevation zone.
Wildlife	Wildlife
Snags:	
After commitment of a forest tract to intensive timber management, the provisions of snags are one of the most important considerations for the retention of forest species.	Where present, BLM will provide and maintain an average of 5-6 hard snags per acre (where feasible additional snags should be provided).
Recommendations are based on the needs of the most common and widespread primary cavity users observed in the SYU during 1978 field inventories. Various references were consulted (Bull 1978, Thomas 1979, USFS 1979b, and CDFG no date).	- Approximately one-half of all snags retained should exceed 21" in diameter and preferably be over 45' in height. While large snags are preferred, advantage should be taken of any snags, particularly during initial harvest and early implementation of snag retention programs.
The potential 6 snags per acre resulting from the six leave trees as explained in the managed old-growth alternative would eventually result in a high degree of retention of cavity users throughout the SYU. For this alternative to be of immediate benefit to wildlife, provisions should be made to provide these snags upon initiation of this management alternative.	- Snags can be left in small groups or singles to take advantage of existing snags. As snag management proceeds, it is desirable to distribute snags throughout the area. Overall, it is somewhat more desirable to leave proportionally more snags in the proximity of forest edges and streams.
The reason so many snags are necessary is, for every snag suitable (various sizes and stages of deterioration) for cavity nesters, up to 15 may not be suitable (Bull 1978). However, most snags are used for perching and feeding by birds and will eventually be used as downed log habitat by a host of forest wildlife.	- Where choice is possible, ponderosa pine is a preferred species for snag retention. - All possible efforts will be made to meet snag requirements upon initial timber harvest entry. In some cases this may require leaving a safety zone (a radius of the length of the snag) around its base to protect workers. (See glossary for snag definition.)
Downed Logs and Debris:	
It is known that logs and forest debris provide habitat for a wide variety of wildlife and are important to the long term health of the forest environment (Franklin et al. 1979)	BLM will leave a minimum of 6 downed logs per acre (Thomas 1979). Additional logs are desirable.
At present there is no known scientific basis for predicting optimum amounts of logs and debris.	- When harvesting a stand, all presently occurring downed logs will be left in place. If an impassable jumble of logs is present, some can be scattered and, if necessary, removed.
It is known that a variety of logs in various stages of decay are desirable (Thomas 1979).	- Where the minimum number of logs does not occur, unmerchantable sections of cut cull trees will be left in place or brush piles can be substituted until downed logs can be recruited. - Uncharred logs are preferred since charring hardens the surface and slows decomposition, making them less valuable to wildlife. In this regard, broadcast burning of large acres of the forest floor will be discouraged. - It is desirable to maintain a variety of logs in various stages of decomposition, and orientation along contour lines is preferred (Thomas 1979). - The most desirable logs are at least 17" in diameter and 20' in length.

COMMENTS	MITIGATION
Wildlife (Continued)	Wildlife (Continued)
Hardwood (Broad-Leaved) Tree Retention:	
While it is implied that all broad-leaved trees and shrubs could not be removed during timber stand improvement a more conscious approach to size, number, and distribution should be required to provide plant species and canopy diversity.	BLM will retain and maintain a minimum of five mature broad-leaved trees per acre and the same number of younger replacement trees.
There are no known criteria for determining acceptable levels of broad-leaved tree retention at this time.	- Species retained will be representative of natural vegetation occurring on the site; however certain plants have greater value for wildlife than others. One such example is black oak (Quercus kelloggii). - Broad-leaved tree retention and recruitment recommendations will be made on a case-by-case basis by a wildlife biologist.
Protection of Seeps, Springs, Ponds, and Meadows:	
Seeps and springs are important to wildlife and should receive protection similar to streams.	Springs and seeps will be protected by 75' of undisturbed zones.
Meadows and forest edges contribute to overall forest habitat diversity and many species require these habitats in close proximity to one another. Naturally occurring wet meadows are especially important. The relatively small size of most timber stands makes the protection of meadows difficult.	Natural meadows will be protected by a minimum 75' buffer zone (measured horizontally). Final width recommendation will depend on density of the stand and other site specific criteria. A selective harvest may be permitted; however a minimum canopy cover of 50% will remain, and no more than half of the trees with dbh of 21" will be removed. All snags will be retained. The integrity of meadows will not be altered by timber harvest activities, including operation of machinery, falling, yarding, road construction, etc. If on a particular site it is believed that a 75' buffer zone would result in excessive damage from windthrow, the zone will be expanded or cutting will not occur.
Stand Management:	
Because of the overall small size of timber stands, it is difficult to manage for various stages of succession and thereby provide a continuum of all stages of succession in a local area. Legal difficulty and cost of access to Federal tracts compounds the problem. Consequently, timber harvest proposals are relatively large with frequent entry and would result in much of a timber stand area in one stage of succession.	A minimum of 20 acres of mature and/or old-growth forest will be retained in each harvest area. This is especially important where the harvest block is relatively small and contains all or most of the remaining mature timber in an area. Additional area may be required where sensitive species are involved.
Steps should be taken to retain and/or provide mature and old-growth forest in all harvest areas. This would involve long term planning.	Attempts will be made to reduce the size of harvest area and stagger cutting cycles to provide a continuum of forest successional stages through long-term planning.
An aspect of a multi-layered canopy should be retained. Maintaining scattered broad-leaved trees and super-dominants would fulfill part of this requirement. A greater size and variety of conifers should also be considered.	
Sensitive Species:	
Spotted Owl If suitable old-growth reserves are not provided, spotted owl habitat can be preserved on a case-by-case basis. These areas would also provide habitat for a great variety of forest dependent species.	Approximately 300 acres, or where available more, will be provided for each pair of spotted owls. There have been 15 observations of this species as noted in Chapter 3 on public lands in SYU 13. If further inventory of these areas identifies them to be nesting sites, approximately 4,500 acres or 9.24 percent of the available productive forest land base would be deferred from forest management activities for an undeterminable period. Less area may be

COMMENTS	MITIGATION
Wildlife (Continued)	Wildlife (Continued)
Sensitive Species: (Continued)	provided where habitat use occurs in part on land in other ownership and can be preserved through cooperative effort (i.e., this would primarily involve the Nature Conservancy's North Coast Preserve and the U.S. Forest Service). Land classified as nonproductive forest can be incorporated if it provides suitable habitat. BLM will monitor known spotted owl areas every two years. Acres set aside for owls include the following: - the nest site or grove - the permanent water course closest to the nest area - where suitable, the hillside from drainage area to ridgetop. Mitigation recommendations for the SYU are adapted from Jackman and Scott 1975 and contain information from Nietro 1974 and Gould 1974. Much of the information is also contained in Zarn 1974.
Red-legged Frog Little suitable habitat anticipated on SYU land for this species.	If encountered, additional habitat protection may require the expansion of aquatic buffer zones to 200 feet and special precautions in logging the surrounding area (e.g., suspended cable yarding).
California Mountain King Snake Anticipated but not yet encountered on SYU lands.	Proposed buffer zones and downed log recommendations will provide a high degree of habitat protection for this species. No other mitigation proposed at this time.
Osprey No nesting sites known on SYU lands. Minor feeding use could occur on or adjacent to BLM timber stands.	If encountered on BLM land, nest sites will be protected by a no cut zone 600 feet in diameter (Jackman and Scott 1975). A one-half mile no disturbance zone will be imposed around the nest from February through August.
River Otter Permanent habitat expected to be very limited on SYU lands.	Where encountered, proposed buffer zone will be expanded to 200 feet and special logging methods imposed to reduce land disturbance.
Ringtail Because of habitat preference and proposed buffer zones, very little impact is anticipated.	No further mitigation proposed at this time.
Mountain Lion Due to large territory size and habitat preference, little impact is anticipated.	Any denning areas encountered will be protected from human disturbance by rerouting roads and other measures to reduce human disturbance. Bobcats will receive the same consideration as the mountain lion.
Other Species Requiring Spcecial Protection:	
Goshawk This species occurs in low densities with suitable habitat rapidly being lost. If encountered outside of a sizable reserve area, special habitat protection is necessary.	An undisturbed area of a minimum of 40 acres will be maintained around the nest site. Long term planning should provide for maintaining suitable nesting habitat in the area for the future. As much north facing slope should be included as possible (Jackman and Scott 1975). Ultimate size will depend on the amount of forest in the area. No timber harvest operations will occur within one-half mile of the nest site from March through August (USFS 1979b). There have been 3 observations of this species as noted in Chapter 3 on public lands in SYU 13. If further inventory results in identification of definite nest sites, approximately 120 acres or 0.2 percent of the available productive forest land base would be deferred from forest management activities for an undeterminable period.

COMMENTS	MITIGATION
Wildlife (Continued)	Wildlife (Continued)
Roads:	
Road crossings of streams should be discouraged. Often the major cause of stream degradation can be attributed to roads.	Where stream crossings are absolutely necessary, the road will be constructed in such a manner so as to reduce the amount of streamside area involved to a minimum. This would involve an attempt to cross the stream and its buffer zone at a right angle.
Streamside zones are also extremely valuable to the widest variety of wildlife in an area (Bull 1978 and Thomas 1979).	Roads and skid trails will not parallel buffer zones.
Timber Sale Inventory:	
Timber sale inventory by a qualified biologist is necessary if meaningful site-specific mitigation is to occur and for compliance with various laws and directives (e.g., Endangered Species Act 1973, amended 1978 and 1979).	Each proposed timber sale and road network will be inventoried by a wildlife biologist at an early stage of planning. Biologists from other agencies (e.g., CDFG, USFWS) will be asked to participate in sale area inspection and recommend mitigation. Special effort will be made to determine if suitable habitat is present for other low density species, including pine marten, fisher, red tree mouse and flamulated owl.
Cultural/Sociocultural	Cultural/Sociocultural
Avoidance is the preferred method for the protection of prehistoric and historic sites. Sites must be protected from vandalism and inadvertent destruction.	Mitigation will include: Signing- Under conditions of active or potential vandalism, cultural resources will be adequately signed, identifying the protection afforded by law. Care will be taken to ensure that signs are placed in a manner not to intrude upon the values of the site or to draw attention to the resource. Fencing/Gating - According to the control and preventive measures desired, fences, barriers, railings and gates can be used alone or in combination for restrictable access. In some cases it may be necessary to selectively exclude access to portions of the cultural resource. As with other on-site physical measures, care will be taken not to damage or intrude upon more values than are protected. There are different kinds of fences, barriers, railings and gates and different materials that can be used. The planned design and materials will avoid unwarranted intrusion on the site. In the design of barriers, maintenance requirements and safety will be considered. Patrolling/Surveillance - Patrols and inspections will be determined by the fragility of resource, degree of threat present, and the use and importance of the cultural resource. Where possible, fragile and accessible cultural resources will be visited and inspected frequently. The visit will result in a report documenting the status of the resource. The report will be evaluated by local, State and Federal agencies and other interested parties. Irregularly scheduled patrols are one of the best means of preventing pothunting, vandalism and other unauthorized use. Patrolling requires careful planning and timing to be effective.

COMMENTS	MITIGATION
Cultural/Sociocultural (Continued)	Cultural/Sociocultural (Continued)
	Erosion Control - Cultural resources are frequently threatened by various types of erosion. Patrols and inspection surveys will monitor erosion. Checks will be made at water levels, major runoff areas, and where other potential erosion problems exist. Adequate drainage will be provided to prevent damage to resources. Catch basins, diversion dams, and other protection measures can be constructed to reduce erosion and protect the cultural resource. Erosion control should always be performed off-site.
	Class III Inventory (Cultural resource sites): Four prehistoric sites are located on a tract of BLM land included in the 10-year plan. The Bureau will withdraw approximately 200 acres of the tract from the timber base to protect these sites.
	The remaining 7 sites will be protected by 200-foot buffer zones.
Good planning is necessary to inventory and protect sociocultural sites far in advance of proposed activities on public land.	The Bureau will design protective programs, complete compliance requirements, and implement preservation programs at least 1 year in advance of any timber sale or other timber management related activities. Each year the Bureau will complete cultural resource inventories for the tenth year timber sales.
	To determine the effectiveness of the proposed protection measures, the Bureau will develop and implement a monitoring program for each site recorded within the SYU 13 study area. A specific site map will be prepared and permanent photographic points will be established. If it is determined that sites are either directly or indirectly impacted by timber management activities or any other activities, i.e., recreation, the Bureau will reassess this protective program and will immediately initiate efforts to implement more effective measures.
Access to and road building on public land may encourage timber management activities or other site disturbances on adjacent private land.	If cultural resources are known to exist on private lands adjacent to BLM lands, the Bureau will encourage the private party to preserve and protect the prehistoric and/or historic sites.

United States Department of the Interior

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May 9, 1986

MEMORANDUM

TO: Mr. Ed Hastey, State Director, Bureau of Land Management, California State Office, 2800 Cottage Way Sacramento, California 95825

FROM: Project Leader, Endangered Species Office, Sacramento, California 95825

SUBJECT: Consultation requirements for BLM Wilderness Designation 8500 (CA-930.1) (Case No. 1-1-86-I-321)

In response to your May 6, 1986, request for informal consultation regarding designation or non-designation of wilderness status for Wilderness Study Areas (WSA's), we concur with your statement that this process does not require formal Section 7 consultation. Any future actions on WSA's that might affect a listed species can be evaluated at proposal stage and formal consultations initiated if needed.

If you have questions regarding this reply please contact me at FTS/460-4866.

Gail C. Kobetich

cc: Chief, Endangered Species, Portland, OR 97232 (AFA-SE)

IN REPLY REFER TO:

8500
CA-930.1

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
CALIFORNIA STATE OFFICE
2800 Cottage Way
Sacramento, California 95825

MAY 6 1986

Mr. Gail Kobetich, Project Leader
U.S. Fish and Wildlife Service
Sacramento Endangered Species Office
2800 Cottage Way
Sacramento, CA 95825

Dear Mr. Kobetich:

The U.S. Bureau of Land Management in California is preparing eleven final Wilderness EIS's during fiscal year 1986 that will analyze the environmental impacts of wilderness designation or non-designation on a total of 58 Wilderness Study Areas (WSA's). We hereby initiate informal consultation pursuant to Section 7 of the Endangered Species Act concerning this matter.

Some of these WSA's provide important habitat for federally listed or proposed endangered species (for example, Peregrine Falcons and Bald Eagles). It has been determined by the BLM that the designation or non-designation of these areas as wilderness by Congress (at the recommendation of the BLM) will have only incidental benefit to any threatened or endangered species involved, not significant positive or negative effects.

We seek your concurrence that these wilderness designations or non-designations do not themselves require formal Section 7 consultation, but that such consultation must be initiated prior to on-the-ground implementation of activities which may affect threatened or endangered species under wilderness or non-wilderness designations.

Your prompt reply will be greatly appreciated.

Sincerely,

Ed Hastey
State Director

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